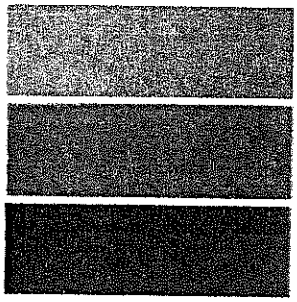
SOURCE EVALUATION RESULTS

PREPARED BY



Envisage Environmental Incorporated

P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

Exhibit D-13

Envisage Environmental Incorporated P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

[redacted]

January 7, 1991

Mr. Ed Price
Hukill Chemical Company
7013 Krick road
Bedford, Ohio 44146

Dear Mr. Price:

The following report is the result of the EPA Methods 18, Measurement of Organic Compounds, and Method 21, Determination of Volatile Organic Compound Leaks. Testing was conducted at the above location on December 13, 1990.

The results are true and accurate to the degree specified in the pertinent section of the Code of Federal Regulations in force at the time of testing concerning the above test methods.

I look forward to answering any questions you may have and assisting you in the future.

Respectfully submitted,

Frank J. Hezoucky
Environmental Project supervisor
ENVISAGE ENVIRONMENTAL INCORPORATED

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Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

DESCRIPTION OF PROGRAM

Envisage
Environmental
Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

DESCRIPTION OF PROGRAM

On December 13, 1990 Envisage Environmental Inc. Conducted an EPA method 18 Measurement of Organic Compounds on the exhaust of the LUWA machine. Three test runs were conducted on this date each run lasting one hour. Testing consisted of drawing the exhaust gases from the LUWA through a charcoal tube with a personal sampling pump. The organic components caught on the charcoal were analyzed by gas chromatography (GC). Before and after each sample run flow rates were taken, enabling the emission rate of Volatile Organic Compounds to be calculated. This was done using EPA Method 2A, Direct Measurement of Gas Volume Through Pipes and Small Ducts.

The second phase of testing conducted on December 13, 1990 consisted of EPA Method 21 Determination of Volatile Organic Compounds leaks. This was done by using a Foxboro Portable Flame Ionization Analyzer calibrated to 100 ppm of methane. Testing was conducted on the various process equipment, valves, flanges and other connections throughout the plant.

Emission testing was determined pointless on the Still Line exhaust due to the unmeasurable flow rate of the unit.

TEST RESULTS

SUMMARY

Envisage
Environmental
Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

TEST RESULTS SUMMARY

Hukill Chemical Company

7013 Krick Road

Bedford, Ohio

LUWA Exhaust

Volitile Organic Compound Emissions

Conducted - December 13, 1990

PARAMETER	RUN # 1	RUN # 2	RUN # 3
Total Volitile Organic Compounds Pounds/hour	0.6262	0.6808	0.7152
Ethanol Emissions Pounds/hour	0.0078	0.0169	0.0171
Methyl Ethyl Keytone Emissions Pounds/hour	0.0001	0.0126	0.0108
Ethyl Acetate Emissions Pounds/hour	0.0087	0.0126	0.0124
Toluene Emissions Pounds/hour	< 1.59E-06 *	4.79E-04	3.75E-04
N-Butyl Acetate Emissions Pounds/hour	< 3.52E-06 *	1.15E-05	8.93E-06
Xylene Emissions Pounds/hour	< 3.52E-06 *	1.15E-05	8.93E-06
Acetone Emissions Pounds/hour	0.2247	0.3504	0.3901
Methyl Isobutyl Keytone Emissions Pounds/hour	< 2.77E-06 *	1.06E-05	9.82E-06
rest as Hexane Emissions Pounds/hour	0.3849	0.2883	0.2847

< DENOTES BELOW DETECTIBLE LIMIT
* NOT included in total lb/hr Volitile Organic Compounds

Envisage Environmental Incorporated
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Phone (216) 526-0990

TEST RESULTS

Hukill Chemical

LUWA Exhaust

Volitile Organic Compound Emissions

DATE: December 13, 1990	Symbol	Units	RUN # 1	RUN # 2	RUN # 3
Time of Day			1038 1138	1146 1246	1250 1350
1 Pump Volume-dry,std.	Pvstd	cu. ft.	0.2440	0.2474	0.2464
2 Flue Gas Volume-Std.	SCFM	cu. ft.	1.5470	1.6592	1.6630
1 Ethanol					
- Concentration	Cs	gr/dscf	0.586	1.191	1.202
- Rate	E	lb/hr	0.0078	0.0169	0.0171
2 Methyl Ethyl Keytone					
- Concentration	Cs	gr/dscf	0.130	1.212	1.124
- Rate	E	lb/hr	0.0001	0.0126	0.0108
3 Ethyl Acetate					
- Concentration	Cs	gr/dscf	0.653	0.885	0.870
- Rate	E	lb/hr	0.0087	0.0126	0.0124
4 Toluene					
- Concentration	Cs	gr/dscf	< 0.00012	0.034	0.026
- Rate	E	lb/hr	< 1.59E-06	4.79E-04	3.75E-04
5 N-Butyl Acetate					
- Concentration	Cs	gr/dscf	< 0.00027	0.00081	0.00063
- Rate	E	lb/hr	< 3.52E-06	1.15E-05	8.93E-06
6 Xylene					
- Concentration	Cs	gr/dscf	< 0.00027	0.00081	0.00063
- Rate	E	lb/hr	< 3.52E-06	1.15E-05	8.93E-06
7 Acetone					
- Concentration	Cs	gr/dscf	16.948	24.636	27.364
- Rate	E	lb/hr	0.2247	0.3504	0.3901
8 Methyl Isobutyl Keytone					
- Concentration	Cs	gr/dscf	< 0.00021	0.00075	0.00069
- Rate	E	lb/hr	< 2.77E-06	1.06E-05	9.82E-06
9 rest as Hexane					
- Concentration	Cs	gr/dscf	29.02689	20.27016	19.97520
- Rate	E	lb/hr	0.3849	0.2883	0.2847

< DENOTES BELOW DETECTIBLE LIMIT

Envisage Environmental Incorporated
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Phone (216) 526-0990

LABORATORY SECTION

Envisage
Environmental
Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

TMA
Thermo Analytical Inc.

TMA/ERG
777 Exchange Street
Cleveland, OH 44125-3337

(216) 447-0790

Envisage Environmental
PO Box 152
Richfield, Ohio 44256

Date: January 2, 1991

Attn: Mr. Tom Holder

Date Collected: Unknown
Date Received: 12/17/90

TMA ID: 8865:01-08
CLIENT ID: 90-1789-2312

PARAMETER (Large Tubes)	RUN #1		RUN #2		RUN #3		RUN #4	
	Front	Back	Front	Back	Front	Back	Front	Back
Ethanol	4.7	0.66	13	1.8	13	1.9	ND	ND
Methyl Ethyl Ketone	1.8	0.17	17	1.7	16	1.7	ND	ND
Ethyl Acetate	8.6	0.87	12	1.2	12	1.3	ND	ND
Toluene	<0.0019	<0.0019	0.54	<0.0019	0.42	<0.0019	ND	ND
N-Butyl Acetate	<0.0042	<0.0042	0.013	<0.0042	0.010	<0.0042	ND	ND
Xylene	<0.0019	<0.0019	0.0050	<0.0019	0.0040	<0.0019	ND	ND
Acetone	150	20	210	29	250	36	ND	ND
Methyl Isobutyl Ketone	<0.0033	<0.0033	0.012	<0.0033	0.011	<0.0033	ND	ND
Rest as Hexane	300	36	220	26	210	29	ND	ND

PARAMETER (Small Tubes)	RUN #1		RUN #2		RUN #3		RUN #4	
	Front	Back	Front	Back	Front	Back	Front	Back
Ethanol	2.5	1.4	3.2	1.1	2.9	1.4	ND	ND
Methyl Ethyl Ketone	0.060	0.029	0.56	0.17	0.20	0.057	ND	ND
Ethyl Acetate	0.62	0.23	0.74	0.25	0.47	0.12	ND	ND
Toluene	<0.0019	<0.0019	<0.0019	<0.0019	<0.0019	<0.0019	ND	ND
N-Butyl Acetate	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	<0.0042	ND	ND
Xylene	<0.0019	<0.0019	<0.0019	<0.0019	<0.0019	<0.0019	ND	ND
Acetone	64	34	110	46	100	51	ND	ND
Methyl Isobutyl Ketone	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	<0.0033	ND	ND
Rest as Hexane	81	42	53	26	54	26	ND	ND

Results reported in milligrams
ND = non-detectable.

Approved by: Gunars Zikmanis
Gunars Zikmanis, Laboratory Manager

6

LABORATORY SUMMARY SHEET

Hukill Chemical

LUWA Exhaust

Volitile Organic Compound Emissions

DATE: December 13, 1990	Symbol	Units		RUN # 1	RUN # 2	RUN # 3
1 Sampling Time	t	minutes		60.0	60.0	60.0
2 Barometric Pressure	Pb	in. Hg		29.45	29.45	29.45
3 Sample Pump Volume	Pv	cu. ft.		0.2390	0.2390	0.2390
4 Pump Temperature		degrees F		49.0	42.0	44.0
	Tm	degrees R		509.0	502.0	504.0
5 Stack Temperature		degrees F		48.0	48.0	47.0
	Ts	degrees R		508.0	508.0	507.0
6 Sample Weight:	Mn					
- Ethanol		mg		9.26	19.10	19.20
- Methyl Ethyl Keytone		mg		2.06	19.43	17.96
- Ethyl Acetate		mg		10.32	14.19	13.89
- Toluene		mg	<	0.0019	0.54	0.42
- N-Butyl Acetate		mg	<	0.0042	0.013	0.010
- Xylene		mg	<	0.0019	0.0050	0.0040
- Acetone		mg		268.0	395.0	437.0
- Methyl Isobutyl Keytone		mg	<	0.0033	0.0120	0.0110
- rest as Hexane		mg		459.0	325.0	319.0

< DENOTES BELOW DETECTIBLE LIMIT

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

EPA METHOD 21

SUMMARY

Envisage
Environmental
Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

EPA METHOD 21

COMPANY Hukill Chemical

CALIBRATED TO TYPE GAS 17. Methane

CONCENTRATION

DESCRIPTION OF SOURCE Old Lucky ~~MOTOR~~ bottoms pump, Valves, drip pan

SOURCE CONCENTRATION Peaking 450 ppm (background 40ppm) on shaft drive.

Scale 0 - 1000 ppm

RESPONSE ON OVA: Fluctations due to drafts.

NOTES OVA analyzed on shaft cover. Concentration cycled between 100 and 250 ppm. Concentrations also cycled between 300 and 400 ppm. Garage Doors were shut to cut down resistance from wind.

Drip pan below shaft pegged the instrument over 1000ppm.

Valves - 60 - 80ppm #110 & #117

Behind pump against wall - 100ppm

Drain gate by pump - 120 - 140 ppm

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EPA METHOD 21

COMPANY Hukill

CALIBRATED TO TYPE GAS

CONCENTRATION

DESCRIPTION OF SOURCE New Luwa System. Bottons pump and Fuels Valves.

SOURCE CONCENTRATION

80ppm background - Doors Shut.

0 - 100ppm Scale

RESPONSE ON OVA

NOTES

Shaft ⇒ 80 - 100 ppm, no drip pan on old system.

Valves ⇒ 100 ppm

Under pump Grating ⇒ 100ppm → 80ppm

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EPA METHOD 21

COMPANY Hukill

CALIBRATED TO TYPE GAS

CONCENTRATION

DESCRIPTION OF SOURCE East Hazardous Waste Dyke - Hazardous Waste Tank Farm

SOURCE CONCENTRATION ~~0ppm~~ on background 6ppm

Scale 0-10 ppm

RESPONSE ON OVA

NOTES

V-114 : Tank valve 0ppm   V-614 = Tank valve 5.4ppm

Pump Valve 0ppm   V-120 = Tank valve 7.0ppm

V-214 : Tank Valve 7ppm

Pump Valve 7ppm   Feed Valve in Dock - 18 (Same as background of area)

V-314 : Tank valve 5.4 ppm

Pump valve 5.2 ppm

V-414 : Tank valve 6.8 ppm

Pump Valve 6.0ppm

V-514 : Tank valve 6.0ppm

Pump valve 6.0ppm

V-4000 : 5.2 ppm

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EPA METHOD 21

COMPANY Hulvill

CALIBRATED TO TYPE GAS

CONCENTRATION

DESCRIPTION OF SOURCE Circulating Pump and Valves

SOURCE CONCENTRATION

Background 18ppm

0-100ppm Scale

RESPONSE ON OVA

NOTES V-112 valve - 18ppm.

V-117 : Valves 16-20ppm

Pump: 400ppm - 600ppm Cycling around pump

Cam-Lock Fitting - 18ppm

West Feed - 19ppm

EAST Feed Tank - 15ppm

Transfer pump - 200 → 300ppm (shaft w/ drip Trunk)

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EPA METHOD 21

COMPANY Hukill

CALIBRATED TO TYPE GAS

CONCENTRATION

DESCRIPTION OF SOURCE Tankman → South Hazardous Waste Dyke

SOURCE CONCENTRATION

0 - 100 scale Background 10ppm

RESPONSE ON OVA

NOTES V-1000 Valves
V-110 Valves
V-210 Valves
V-175 valves all showed background levels of 10ppm

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EPA METHOD 21

COMPANY Tuttle

CALIBRATED TO TYPE GAS

CONCENTRATION

DESCRIPTION OF SOURCE Distillation Re-boiler

SOURCE CONCENTRATION

0-100 scale Background 19 ppm

RESPONSE ON OVA

NOTES

Sample Valve w/ end : 30 ppm ~~30~~ ppm

Return Valve : 20-22 ppm

LOAD Valve : ~~30-40 ppm~~ 30-40 ppm 0-~~100~~ scale

Distill Lid : 150 ppm 0-1000 scale

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Phone (216) 526-0990

EPA METHOD 21

COMPANY Hukill

CALIBRATED TO TYPE GAS

CONCENTRATION

DESCRIPTION OF SOURCE

New LNWA Feed pump. & BACKwash TANK

Old LNWA Feed pump.

SOURCE CONCENTRATION

Background 40ppm

RESPONSE ON OVA

NOTES

Shaft : 40-60ppm

Valves : 40 ppm

BACKWASH TANK Vent : 100 - 200ppm.

Valves 40ppm

Old LNWA Feed pump = 20 - 40ppm

Envisage Environmental Incorporated
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EPA METHOD 21

COMPANY Hukill

CALIBRATED TO TYPE GAS

CONCENTRATION Reclaim Feed Lines

DESCRIPTION OF SOURCE

SOURCE CONCENTRATION

Background 40 ppm

RESPONSE ON OVA

NOTES

Reclaim Feed Lines (6)
all showed 20ppm - 40ppm.

- V-4000
- V-4000
- EAST & West Feed
- V110
- V210

Envisage Environmental Incorporated
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Phone (216) 526-0990

EPA METHOD 21

COMPANY Hukill

CALIBRATED TO TYPE GAS

CONCENTRATION

DESCRIPTION OF SOURCE V-110 Feed line and Pump.
Drum Processing Area

SOURCE CONCENTRATION
Background 40ppm

0-1000 scale

RESPONSE ON OVA

NOTES Valves to pump
Valves 1 60ppm
Valves 2 60ppm
Valves 3 45ppm
Valve 4 40ppm
Sample Valve 40ppm
Valve 5 80ppm

Shave Tank = greater than 100ppm

Envisage Environmental Incorporated
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EPA METHOD 21

COMPANY Hukill

CALIBRATED TO TYPE GAS

CONCENTRATION

DESCRIPTION OF SOURCE Tanker 502, #606

SOURCE CONCENTRATION

0-100 Scale

Backgrounds 14 ppm

RESPONSE ON OVA

NOTES

#502 Bottom Valves, Compartments 1-5

Readings were same as background

#606 Compartments 1-3, Bottom Valves

Background readings

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EPA METHOD 21

COMPANY Hukill

CALIBRATED TO TYPE GAS

CONCENTRATION

DESCRIPTION OF SOURCE Pump Room

SOURCE CONCENTRATION

0-100 scale

60 ppm background

RESPONSE ON OVA

NOTES 0-1000 scale

Reboiler Feed Line	>1000 ppm
LUWA Feed	700 - 900 ppm
Flush Tank	500 - 600 ppm
Floor Grating	300 - 400 ppm

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EPA METHOD 21

COMPANY

CALIBRATED TO TYPE GAS

CONCENTRATION

DESCRIPTION OF SOURCE Laboratory

SOURCE CONCENTRATION

20 ppm background

RESPONSE ON OVA

NOTES

Acetone WASH buckets

- checked around lips : background => >1000ppm

Waste barrell >1000ppm.

Envisage Environmental Incorporated
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2.1

EMISSIONS SAMPLING

NOMENCLATURE

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

Emissions Sampling Nomenclature - continued

M_w = Molecular weight of water, 18 lb/lb-mole.

P_{bar} = Barometric Pressure, in. Hg.

P_g = Pressure differential from gas stream to atmosphere, (static pressure) in.H_2O.

P_s = Absolute gas stream pressure, ($P_{bar} + P_g/13.6$) in.Hg.

P_{std} = Absolute pressure at standard conditions, 29.92 in. Hg.

P_w = Density of water, 0.0022 lb/ml.

$\hat{P}_{avg}$ = Average of the square roots of the velocity head readings, ($\sqrt{\hat{p}}$) (in.H_2O).

Q = Volumetric flow rate at gas stream conditions, A.C.F.M.

Q_{sd} = Dry volumetric gas flow rate corrected to standard conditions, S.C.F.M.

R = Ideal gas constant, 21.85 in. Hg-ft^3/ ^oR-lb-mole.

t = Total sampling time, minutes.

T_m = Average dry gas meter temperature, ^oR.

T_s = Average absolute gas stream temperature, ^oR.

T_{std} = Standard absolute temperature, 528^o Rankine.

V_{lc} = Volume of water collected in impingers & silica gel, ml.

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Envisage Environmental Incorporated P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

[redacted]

September 18, 1991

Mr. Ed Price
Hukill Chemical Company
7013 Krick Road
Bedford, Ohio 44146-4493

Dear Mr. Price:

The following report is the result of the air flow evaluation conducted on September 13, 1991 at the above facility. Testing was performed at the Batch Still Vent Tank.

The results are true and accurate to the degree specified in the pertinent sections of the Code of Federal Regulations, in force at the time of testing concerning Direct Measurement of Gas Volumes Through Pipes and Small Ducts.

I am looking forward to answering any questions you may have and assisting you in the future.

Respectfully submitted,

Robert C. Hovan
Project Leader
ENVISAGE ENVIRONMENTAL INC.

Exhibit D-14

DESCRIPTION OF PROGRAM

On September 13, 1991 Envisage Environmental Inc. conducted EPA Methods 2A, Direct Measurement of Gas Volume Through Pipes and Small Ducts evaluation at the Hukill Chemical facility located in Bedford, Ohio. The purpose of these tests was to determine the Volatile Organic emission rate of the Batch Still Vent Tank.

The Envisage testing team consisted of Messrs. Robert Hovan, and Mark Geirke. Mr. Ed Price, Hukill Chemical, coordinated the testing.

The testing was performed at one of the three conservation vents (figure 2) while the other two vents were capped shut. The initial run consisted of operating the Distillation Tower at normal parameters, steam flow 800 lbs/hr at 70 degrees fahrenheit. The temperature is recorded at thermocouple #8 (T-8) (figure 1) at the top of the distillation tower. The process was operating at these conditions for three hours prior to conducting run #1. The dry gas meter was set up and monitored for one hour. There was no recordable flow during this time period (9:45am - 10:45am).

The second run (11:00am - 11:45am) consisted of increasing the steam loading by 25% to find a process point where venting from the Batch Still Vent Tank would occur. The parameters for the second run were a steam flow of 1009 lbs/hr at a T - 8 temperature of 95 degrees fahrenheit. At these conditions, the Batch Still Tank exhibited a flow rate of 0.3 cubic feet/minute after approximately 45 minutes.

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

FIGURE 1

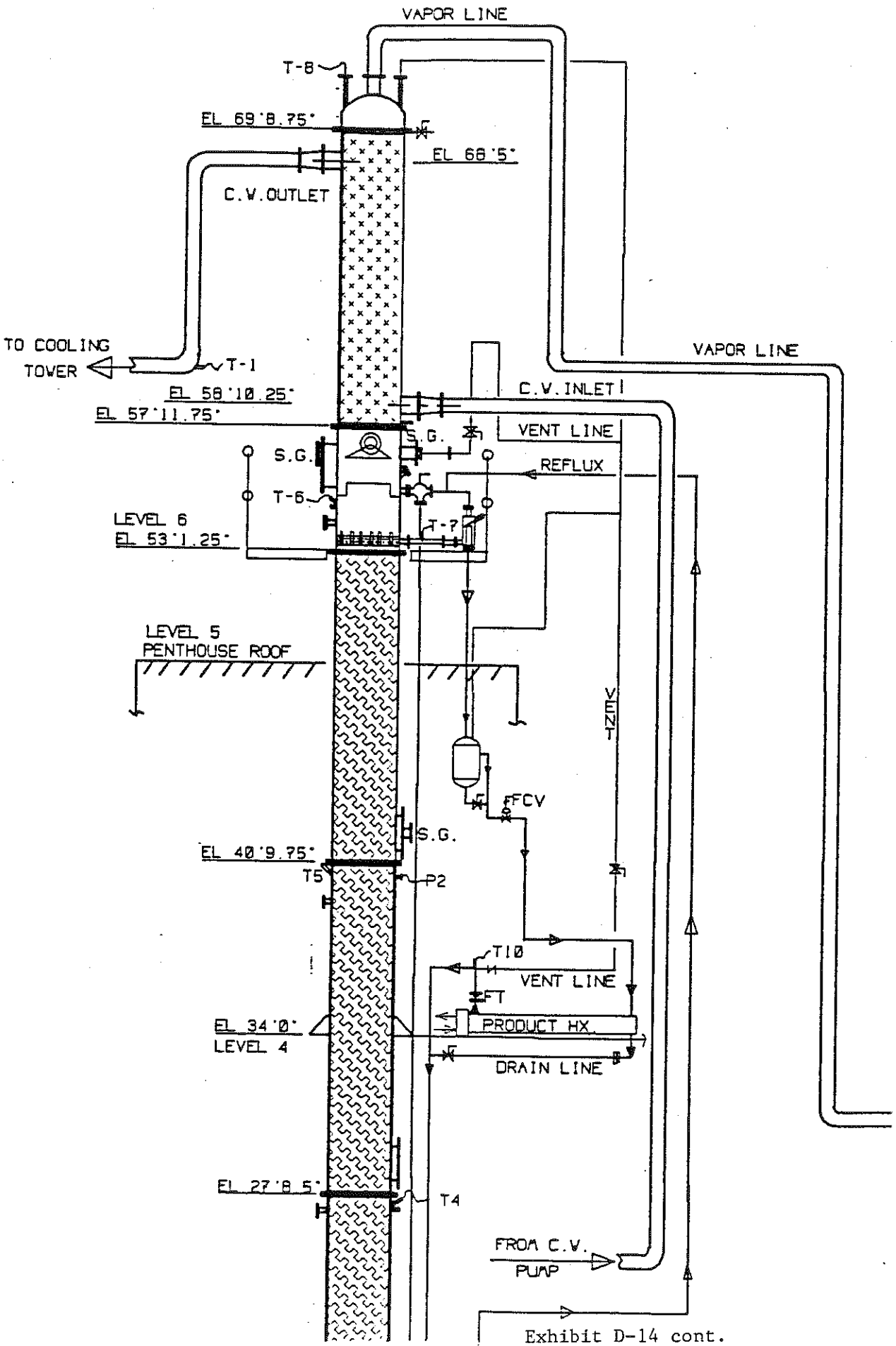
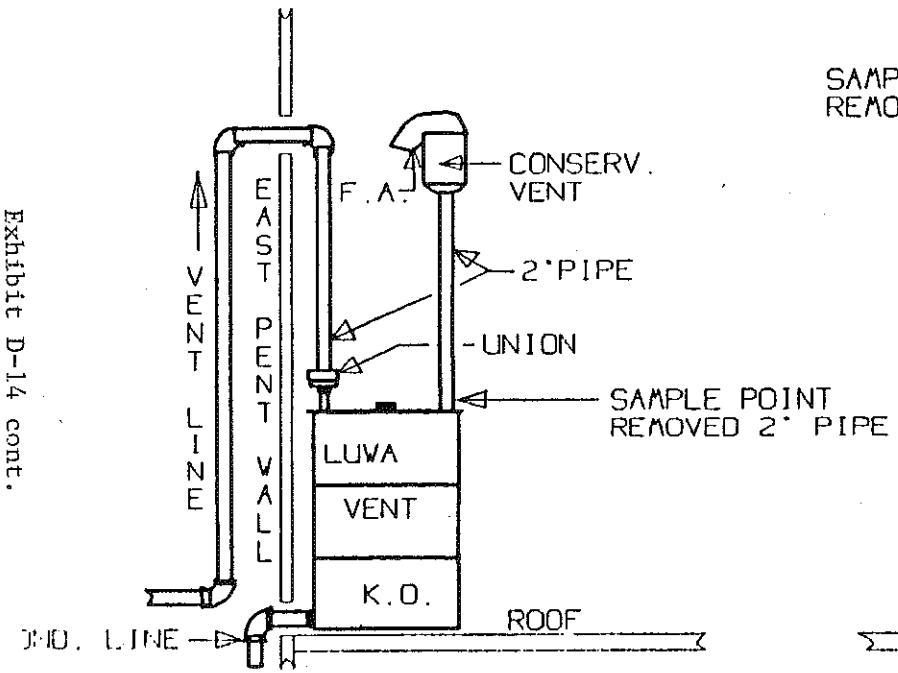


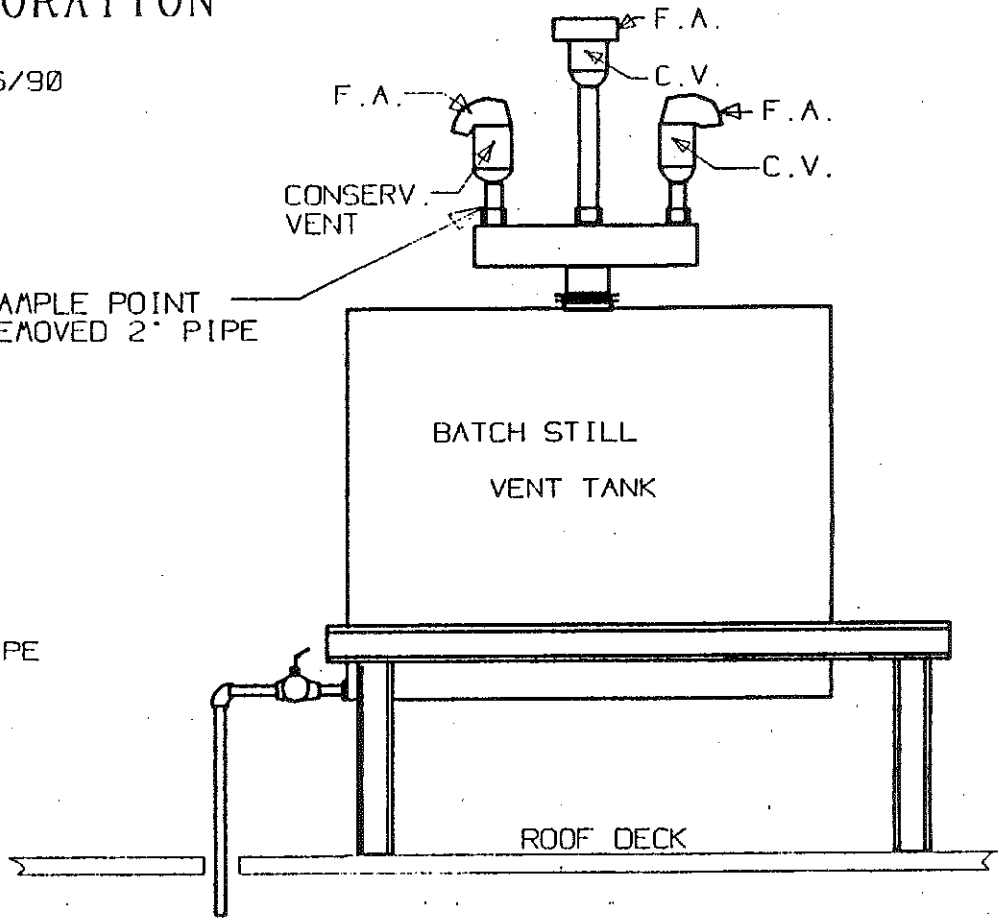
Exhibit D-14 cont.

HUKILL CHEMICAL CORPORATION

\AIRPERM\PROCVENT Rev. 12/26/90



LUWAS' VENT



BATCH STILL VENT

EST LOCATIONS FOR COMPLIANCE WITH ORGANIC AIR EMISSION REGS

Exhibit D-14 cont.

FIGURE 2

MR

DISTILLATION TOWER CONTTROL SHEET

DATE: 9-13-91 CUSTOMER CODE: K-17 J.O.#: 13235 MATERIAL: MeCl2

MIL. TIME	STM. FLOW	STM. PRES	IN W-1	OUT W-2	RET T-1	POT T-2	VAP T-3	T-4	T-5	T-6	T-7	B.O. T-8	RFX T-9	PRD T-10	POT PRS	P-1	P-2	REFX. FLOW	PROD. FLOW	REMARKS: O.H./POT %, 2-PHASE, TANK VOL./CHANGE, ECT...
range	4000	130	0-200		50-350				100-300						30	25	10	0-50	0-10	
units	#/HR.	PSI	DEGRESS FAHRENHEIT												PSI	INCH'S H20		Gals./Min.		
4:00	Steam on Tower							4:30 Reflux Pump on						5:00 OH 10 v-29-55						% / %
6:00	781 / 5.8	78	64	72	165	107	99	96	86	95	94	78	95	65	—	8	0	12	2.0	99.82 % MeCl2 / %
7:40 A	740	78	63	72	105	109	90	97	90	<100	<100	68	95	68	—	.8	0	6→11	2.0 / 6.0	% / 99.87 % MeCl2
8:30 A	787	78	63	72	105	110	90	97	90	100	<100	67	95	68	—	8	0	6→11	6.0	% / 99.87 % MeCl2
10:30 A	5.8 / 807	78	64	73	105	114	93	99	89	98	94	71	96	69	—	7	0	10	6.0	% / 99.84 % MeCl2
11:40 A	6.2 / 1009	78	68	78	106	118	95	99	92	99	94	95	96	71	—	9	0	11	6.0	% / 99.85 % MeCl2
																				% / %
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Exhibit D-14 cont.

HUKILL CHEMICAL CORP. LEAK DETECTION MONITORING DATA SHEET Date 9-27-91 Page 1 of —

Instrument Used For Testing: FOX 5000 Calib. Gas CH4 Outside Temp. 54.1 °F
Inst. Operated by: BOB HOVAN WIND. 5-10 MPH From South East
Equip. Identified by: MARK MATTHEWS UCC.

COMPONENT	LOCATION	EQUIPMENT	PROCESS STREAM	TEST VALUE (ppm)	VISIBLE LEAK (Y/N)	COMMENTS
DISTILLATION AREA:						
Room	Distillation Area Background	NA	NA	30	N	
PFLN430	Feed Pump	Old Luwa	K-9	30	NO	DRIP PAN
PBLN430	Bottoms Pump	Old Luwa	"	100	"	
VBLN430A	LN430 Btms. Disch. Line to V110M	Old Luwa	"	35-40	"	
VBLN430B	LN430 Btms. Disch. Line to V117	Old Luwa	"	35-40	"	
VBLN430C	LN430 Btms. Drain to Drum	Old Luwa	"	35-40	"	
PFLN500	Feed Pump	New Luwa	D-32 MIBK	20-30	NO	
VFLN500	Feed Pump Valve	New Luwa	"	20-30	"	
VBw	Backwash Line Valve	New Luwa	"	20-30	"	DRIP PAN.
PBLN500	Bottoms Pump	New Luwa	"	40	"	
VBLN500A	LN500 Btms. Disch. Line to V110M	New Luwa	"	30	"	
VBLN500B	LN500 Btms. Disch. Line to V117	New Luwa	"	30	"	
VBLN500C	LN500 Btms. Drain to Drum	New Luwa	"	30	"	
VFV6000	Valve From V-6000 Tank	Pipe Rack	CF	30	NO	
VFV4000	Valve From V-4000 Tank	Pipe Rack	K-9	30	"	
VFEAST	Valve From EAST Feed Tank	Pipe Rack	CF	20	"	
VFWEST	Valve From WEST Feed Tank	Pipe Rack	CF	20	"	
VFV110M	Valve From V-110M Tank	Pipe Rack	CF	20	"	
VFV210M	Valve From V-210M Tank	Pipe Rack	CF	20	"	
Sump Area	Distillation Area Sump - Pump Area	NA	NA	250		
HAZ. WASTE FEED AND BOTTOMS STO. TANK DIKES:						
Dike Area	Feed/Btms. Tk. Dike Background	NA	NA			
PWFEED	West Feed Tank Valve	W. Feed Tk.	CF	<5	NO	
PEFEED	East Feed Tank Valve	E. Feed Tk.	CF	<5	"	
\AIRPERM\LEAKCHK Rev. 1\11\91						

Components to be checked are pump seals, valves, open-ended pipes, relief valves, sample valves.

Exhibit D-15

HUKILL CH. .CAL CORP. LEAK DETECTION MONITORIN. .ATA SHEET Date 9-27-91 Page 2 of —

COMPONENT	LOCATION	EQUIPMENT	PROCESS STREAM	TEST VALUE (ppm)	VISIBLE LEAK (Y/N)	COMMENTS
HAZ. WASTE FEED AND BOTTOMS STO. TANK DIKES (Cont'd):						
PTRANS	East Pad Transfer Pump	Port. Pump	CF	40.	NO	
CTRANS	East Pad Transfer Pump-Cam-lock	Trans. Pump	"	30.	"	DRIP PAN
PU117	Circ. Pump on U-117 Bottoms Tank	U-117 Tank	"	5	"	
VDU117	Disch. Valve U-117 Tank	U-117 Tank	"	5	"	
CDU117	Cam-lock on U-117 Disch . Line	U-117 Tank	"	5	"	
E. PAD HAZ. WASTE STORAGE TANK DIKE:						
Dike Area	HW Sto. Tk. Dike - Background	NA	NA	10		
VDU114	HW Storage Tk. U-114	U-114 Tank	D-3	5	NO	
VDU214	HW Sto.Tk. U-214 Disch. Valve	U-214 Tank	H_2O	5	"	
VDU314	HW Sto. Tk. U-314 Disch Valve	U-314 Tank	H_2O	5	"	
VDU414	HW Sto. Tk. U-414 Disch. Valve	U-414 Tank	H_2O	5	"	
VDU514	HW Sto. Tk. U-514 Disch. Valve	U-514 Tank	SOLV.	5	"	
VDU614	HW Sto. Tk. U-614 Disch Valve	U-614 Tank	D-3	5	"	
VDU120	HW Sto. Tk. U-120 Disch. Valve	U-120 Tank	" "	5	"	
VDU4000	HW Sto. Tk. U-4000 Disch. Valve	U-4000 Tank	K-9	5	"	
HAZ. WASTE FUELS BLEND TANK DIKE:						
Dike Area	HW Fuels Blend Dike - Background	NA	NA	<10	NO	
VDU6000	Fuels Sto. Tk. U-6000 Disch. Valve	U-6000 Tank	MIBK	<10	"	
VDU110M	Fuels Sto. Tk. U-110MDisch. Valve	U-110MTank	CF	<10	"	
VDU210M	Fuels Sto. Tk. U-210M Disch. Valve	U-210M Tank	CF	<10	"	
VDU175	Fuels Sto. Tk. U-175 Disch. Valve	U-175 Tank	F-F-HMAP	<10	"	
VTRANS	HW Fuels Transfer Line Valve	Fuels Dike	CF	<10	"	
BATCH DIST. REBOILER AREA:						
Reboiler	Reboiler Area - Background	NA	NA	50		
VSMPR	Sample Valve - Reboiler	Batch Still	D-3/MIBK	50	NO	
VRETR	Return Valve - Reboiler	Batch Still	"	50	"	
VFILLR	Fill Valve - Reboiler	Batch Still	"	50	"	
MHR	Man Hole Cover - Reboiler	Batch Still	"	50	"	
\AIRPERM\LEAKCHK Rev. 1/11/91						

Components to be checked are pump seals, valves, open-ended pipes, relief valves, sample valves.

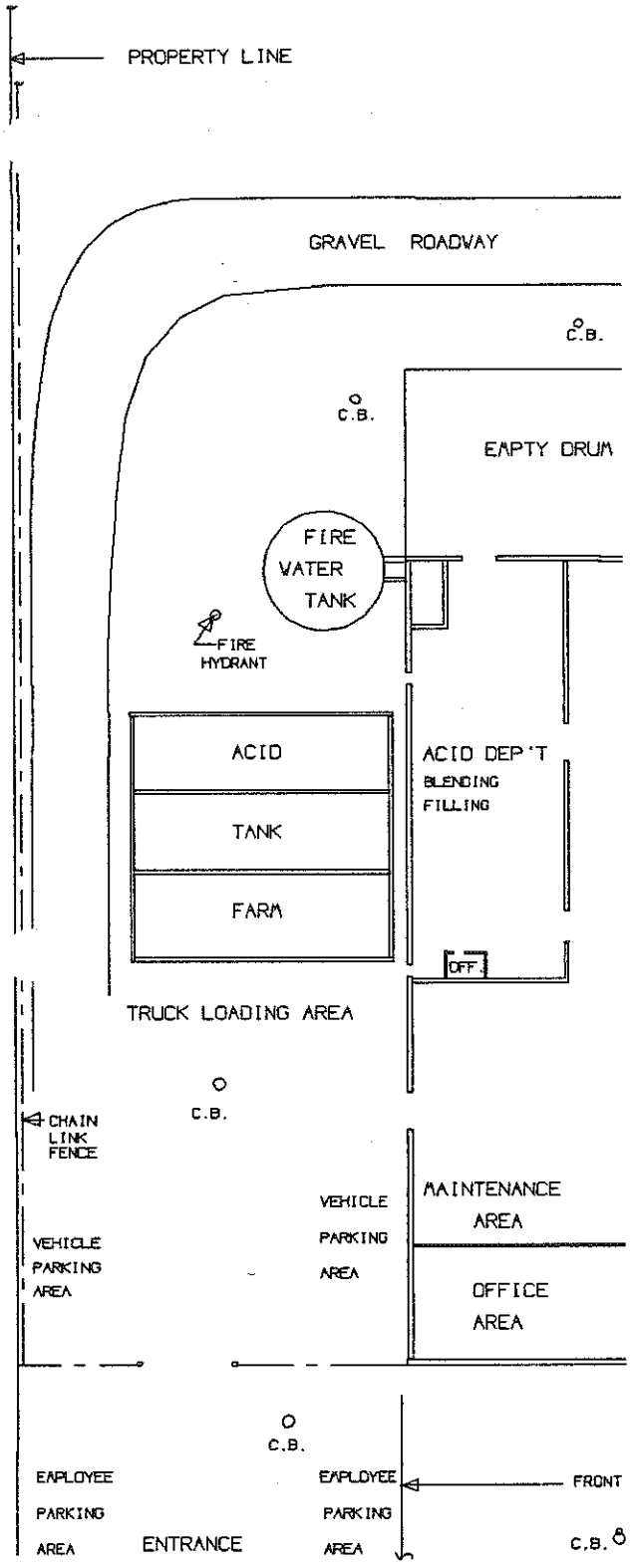
Exhibit D-15 cont.

HUKILL CHEMICAL CORP. LEAK DETECTION MONITORING DATA SHEET Date 9-27-91 Page 3 of ___

COMPONENT	LOCATION	EQUIPMENT	PROCESS STREAM	TEST VALUE (ppm)	VISIBLE LEAK (Y/N)	COMMENTS
DRUM PROCESSING AREA:						
Area	Drum Proc. Area - Background	NA	NA	65		
VFV110M1	Valve on Trans. Line to V-110M	HW Fuels Line	CF	150	NO	WET MATERIAL ON OUTSIDE OF VALVE
VFV110M2	Valve on Trans. Line to V-110M	HW Fuels Line	"	50	"	
VFV110M3	Valve on Trans. Line to V-110M	HW Fuels Line	"	45-50	"	
VFV110M4	Valve on Trans. Line to V-110M	HW Fuels Line	"	45-50	"	
VSV110M	Valve on Trans. Line to V-110M	HW Fuels Line	"	60	"	
VFV110M5	Valve on Trans. Line to V-110M	HW Fuels Line	"	100	"	DRIP PAN
PUMP ROOM:						
Area	Pump Room - Background	NA	NA	80.		
VFLUWAS	Valve to Feed Either Luwa	Pump Room	MIX	80	NO	
VFBSTILL	Valve to Feed Batch Still	Pump Room	MIX	80.	"	
\AIRPERM\LEAKCHK Rev. 1/11/91						

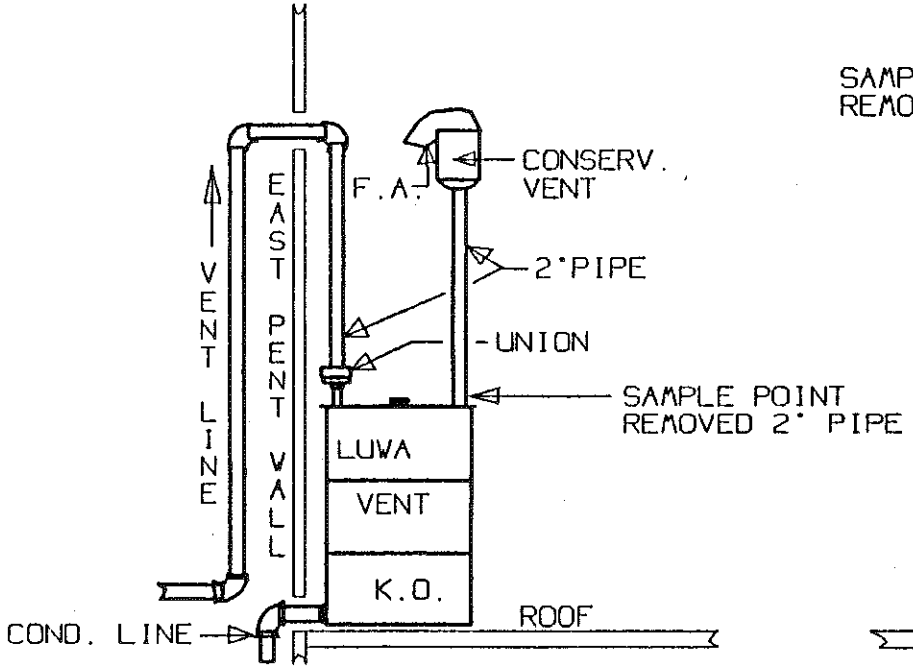
Components to be checked are pump seals, valves, open-ended pipes, relief valves, sample valves.

Exhibit D-15 cont.

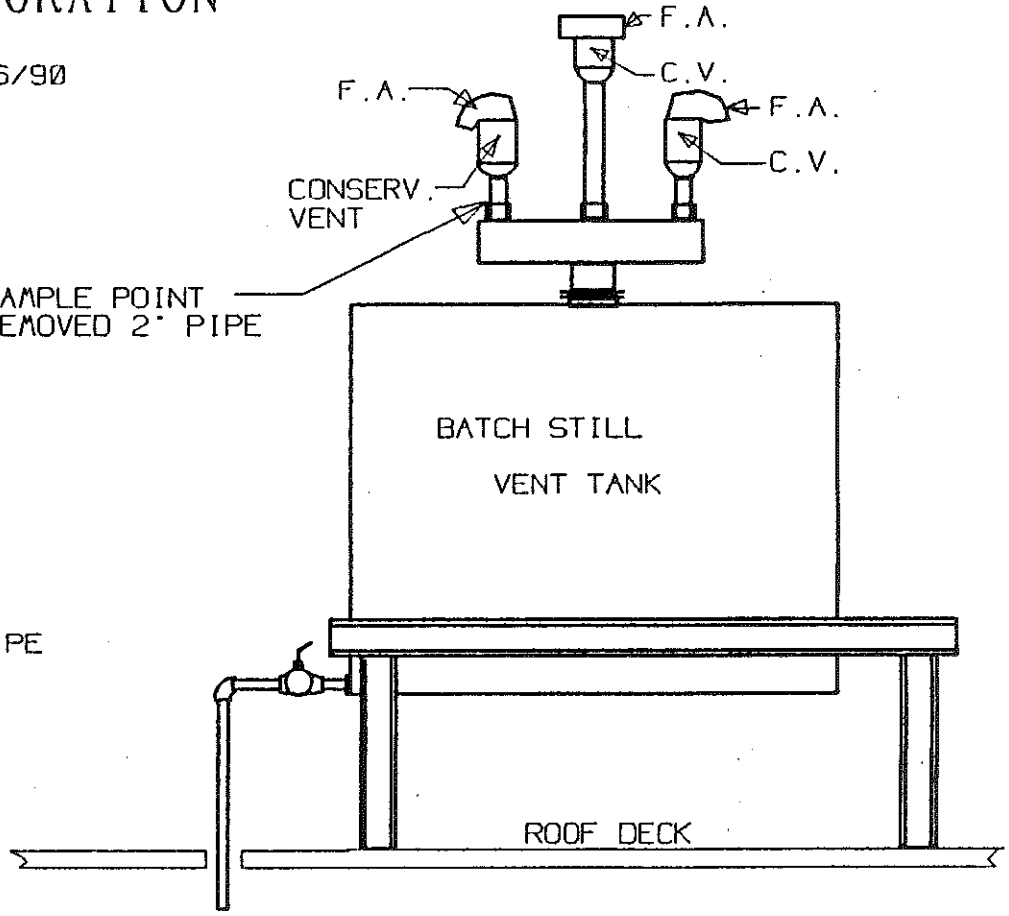

PROPERTY LINE
GRAVEL ROADWAY
C.B.
C.B.
EMPTY DRUM
FIRE
WATER
TANK
FIRE
HYDRANT
ACID
TANK
FARM
ACID DEP'T
BLENDING
FILLING
OFF.
TRUCK LOADING AREA
C.B.
CHAIN
LINK
FENCE
VEHICLE
PARKING
AREA
VEHICLE
PARKING
AREA
MAINTENANCE
AREA
OFFICE
AREA
C.B.
EMPLOYEE
PARKING
AREA
ENTRANCE
EMPLOYEE
PARKING
AREA
FRONT
C.B.

HUKILL CHEMICAL CORPORATION

\AIRPERM\PROCVENT Rev. 12/26/90



LUWAS' VENT



BATCH STILL VENT

TEST LOCATIONS FOR COMPLIANCE WITH ORGANIC AIR EMISSION REGS

Figure D-13

APPENDIX A

INSPECTION LOG SHEETS

INSPECTION LOG SHEET - A
Operating, Structural Equip & Tank Storage Area

Key: Status
✓ - present
X - not present

DATE: _____ MILITARY TIME: _____

INSPECTED BY: _____

COMMENTS : _____

Condition
✓ - operable
M - in need of maint. operable
X - un-operable

-See back for details-

ITEM	STATUS	CONDITION	OBSERVATIONS	CORRECTIVE ACTION TAKEN	CORRECTIVE ACTION DATE SIGNED
Sumps					
Pump					
Ramp					
Dike					
Foundation					
Holding Tanks					
Piping					
Supports					
Spent Acid Tank Sump					
Pump					
Dike					
Foundation					
Tank					
Piping					
Supports					
Spray Booth					

Area/Equipment	Items Inspected	Conditions
Operating and Structural equipment	Sump areas	Erosion, uneven settlement, cracks and spalling in concrete, wet spots
	Pump	Power, clogging
	Ramps	Erosion, uneven settlement, cracks and spalling in concrete
	Dikes	Cracks, deterioration
	Bases or foundation	Erosion; uneven settlement; cracks and spalling in concrete pads, base rings and piers; deterioration of water seal between tank bottom and foundation, wet spots.

Area/Equipment	Items Inspected	Conditions
Tank Storage Area	Holding tanks	Corrosion, discoloration, cracks, buckles, and bulges
	Piping to holding tanks	Loss of metal thickness, leaks, corrosion or deterioration
	Tank structural supports	Concrete deterioration and corrosion of pipe supports
	Paint Spray Booth	Sprinkler Head, filter condition, air flow

INSPECTION LOG SHEET - B
Operating, Structural Equip & Tank Storage Area

Key: Status
✓ - present
X - not present

DATE: _____ MILITARY TIME: _____

INSPECTED BY: _____

COMMENTS : _____

Condition
✓ - operable
M - in need of maint. operable
X - un-operable

-See back for details-

ITEM	STATUS	CONDITION	OBSERVATIONS	CORRECTIVE ACTION TAKEN	CORRECTIVE ACTION DATE SIGNED
Base					
Sump					
Dike					
Pumps					
Debris					
Pallets					
Waste Segregation					
Containers:					
Stacking					
Sealing					
Labeling					
Condition					
Ramps					
Warning Signs					
Shar Mixer					
Catwalk					
Hydraulic Systems					
Raw Materials					
Leaks					
Spills					

Area/Equipment	Items Inspected	Conditions
Container Storage Area	Container placement and stacking	Aisle space, height of stack
	Sealing of containers	Open lids
	Labeling of containers	Improper identification, dat missing
	Containers	Corrosion, leakage, structur defects
	Ramps	Cracks, spalling, uneven settlement, erosion
	Warning signs	Damaged
	Base or foundation	Cracks, spalling, uneven settlement, erosion, wet spots
	Sump area	Cracks, spalling, uneven settlement, erosion, wet spots
	Dikes	Cracks, deterioration
	Pumps (automatic)	Setting adjustment, power, clogging, leakage
	Debris and refuse	Clog sump pump, aesthetics, possible reaction with leaks
	Pallets	Damaged (e.g., broken wood, warping, nails missing)
	Segregation of incompatible wastes	Storage of incompatible wastes in area
	Shar Mixer	hydraulic system, is in operation condition
	Hydraulic System	Is in operating condition
	Raw Materials	Stacked Properly/No spilled material
	Leaks	No leaking of Hazardous Wast
	Spills	No spills of Hazardous Waste
	Containers	Containers are covered and in good condition

HUKILL CHEMICAL CORPORATION INSPECTION SCHEDULE

AREA / EQUIPMENT	ITEM INSPECTED	CONDITION	FREQUENCY
Operating and Structural Equipment	Sump Areas	Erosion, uneven settlement, cracks spalling in concrete, wet spots	Weekly
	Pump	Power, clogging, leaking, excessive noise, frayed electrical cord	Weekly
	Ramps	Erosion, uneven settlement, cracks spalling in concrete	Weekly
	Dikes	Deterioration, cracks	Daily
	Bases or foundations	Erosion, uneven settlement, cracks and spalling in concrete pads, base rings and piers, deterioration of water seal between tank bottom and foundation wet spots	
Tank Storage Areas	Holding tanks	Corrosion, discoloration, cracks, buckles, bulges, small leaking	Daily
	Piping	Loss of Metal thickness, leaks, corrosion or deterioration, bends or kinks	Daily
	Valves and fittings	Leaking, leaking packing, caps on fittings, fittings out of round, tabs are on quick connect caps	Daily
	Tank Structural Supports	Concrete deteriora, cracking corrosion of pipe supports	Daily
Container Storage Areas	Base or Foundation	Cracks, spalling, uneven settlement erosion, wet spots	Weekly
	Sump area	Cracks, spalling, uneven settlement erosion, wet spots	Weekly
	Dikes	Cracks, deterioration	Weekly
	Debris and refuse	Clogged catch basin grating, aesthetics, possible reaction with leaks	Daily
	Pallets	Damaged (broken wood, warping or nails missing	Weekly

HUKILL CHEMICAL CORPORATION INSPECTION SCHEDULE

AREA / EQUIPMENT	ITEM INSPECTED	CONDITION	FREQUENCY
Container Storage Area	Segregation of incompatible wastes	Storage of incompatible wastes in area	Weekly
Continued	Container placement	Aisle space, stack height	Weekly
	Sealing of containers	Open lids, leaks	Weekly
	Labeling of containers	Improper identification, date missing	Weekly
	Containers	Corrosion, leakage structural defects	Weekly
	Ramps	Cracks, spalling, uneven settlement,erosion	Weekly
	Warning Signs	Damaged, illegible	Weekly
Tanker Load/Unload Area	Dock surface	Spills not cleaned	Daily
	Hoses	Area clear of hoses	Daily
	Tools	Area clear of tools	Daily
	Pumps	Not leaking, electric cords	Daily
	Absorbent	Sufficient amount located nearby for spill containment	Daily
Security Devices	Fence	Intact	Weekly
	Gates	Won't open and close	Daily
	Night Lights	Burned out	Daily
	Alarm	Check circuit test	Daily
Monitoring	Tank Level Gauges	Dirty, not floating, freeze	Daily
	High level alarm	Check sensitivity,annunciator,alarm	Daily
	Water table level	Flooding	Daily

OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Francine

CERTIFIED MAIL

FACILITY: Hukill Chemical
NOTICE OF DEFICIENCY TA2
OHIO ID: 02-18-0315
USEPA ID: OHD001926740

November 19, 1991

Robert Hukill
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

Dear Mr. Hukill:

Thank you for your June 18, 1991 response to Ohio EPA's Notice of Deficiency dated March 11, 1991.

The Ohio EPA Division of Hazardous Waste Management has conducted a technical adequacy review of your Part B application and has determined it to be technically inadequate. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapters in the Ohio Administrative Code and the corresponding Federal regulations.

We have enclosed technical adequacy comments that are the result of this review. Please provide detailed information addressing all areas indicated on the comment sheets to Ohio EPA within 45 days of the date of receipt of this correspondence. This submission shall be in accordance with the following editorial protocol or convention:

1. Old language is overstruck.

2. New language is capitalized.

3. Page headers should indicate date of submission.

4. If significant changes are necessary, pages should be renumbered, table of contents revised, and complete sections provided as required.

053-63

Please send one copy each to:

Tom Crepeau
Ohio EPA, DHWM
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-0149

Lisa Pierard
RCRA Activities
Part B Application
U.S. EPA - Region V 5HR-13
230 South Dearborn Street
Chicago, Illinois 60604

Please send two copies to:

Kristin Switzer
Ohio EPA, Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

In the course of the technical adequacy review, we may request additional information if it is necessary to clarify, modify, or supplement previous submissions of information in order to substantively evaluate the permit application for adequacy.

Failure to submit a complete permit application or to correct deficiencies in the application may result in the following: 1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, 2) denial of the permit application, 3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action.

We request that the facility contact Kristin Switzer, NEDO, at (216) 425-9171 within 10 days of receipt of this NOD to discuss each of the enclosed comments in order to make clear the information being requested. This can be accomplished by a conference call or meeting. Thereafter, any questions concerning the review of this permit application and the level of detail expected, should also be addressed to the above mentioned person.

Sincerely,

Edwin Y. Lim, Manager
RCRA Engineering Section
Division of Hazardous Waste Management

cc: Lisa Pierard, U.S. EPA
Joel Morbito, U.S. EPA
Tehmton Toorkey, CO, DHWM, Ohio EPA
Frank Basting, CO, DHWM, Ohio EPA
Pam Allen, CO, DHWM, Ohio EPA
Rhonda Rothschild, CO, DHWM, Ohio EPA
Kristin Switzer, NEDO, DHWM, Ohio EPA
Central File

PART B REVIEW COMMENTS
Hukill Chemical Corporation
OHD 001 926 740
02-18-0315

TECHNICAL ADEQUACY COMMENTS

GENERAL COMMENTS

1. The general organization of the permit application is confusing. Plan sheets, exhibits, drawings, and like information are often not referenced and are not readily accessible. All information included in the permit application must be referenced in the appropriate text of the application by section number and page number. Also, the permit application must be structured according to the enclosed checklist for better organization of required information.

2. The hazardous waste fuels blending tanks are considered by the Ohio EPA to be regulated units which must be permitted. Although the blending of hazardous waste fuels is exempt from being considered a permitted activity, the tanks must be permitted since they are used for storage of off-site hazardous wastes. The permit application must be revised in all applicable sections to meet the requirements for permitting of hazardous waste fuels blending tanks. The Part A and Part B permit applications must include all existing and proposed hazardous waste fuels blending tanks as storage units.

A PART A APPLICATION

3. The Part A application must include a scale drawing of all past treatment, storage, and disposal areas as required by OAC 3745-50-43(A)(4). Plan Sheet 1A and Plan Sheet 2 show only future and present treatment, storage, and disposal areas located at the facility.

4. The Part A application must be modified to include detailed photographs of all existing treatment, storage, and disposal areas located at the facility as required by OAC 3745-50-43(A)(5). The copies of photographs submitted do not clearly show all existing treatment, storage, and disposal areas. Actual photographs would more clearly show all existing treatment, storage, and disposal areas.

B FACILITY DESCRIPTION

5. B-2a Topographic Map, General Requirement:
OAC 3745-50-44(A)(19);

Plan sheets indicating existing and proposed facility conditions must be provided for the following:

a. Surrounding land uses; and

b. The location of all monitoring wells within the facility.

If this information is currently in the permit application, Section B must be revised to indicate the location of the information.

6. B-4 Traffic Information:
OAC 3745-50-44(A)(10);

The facility must provide traffic related information demonstrating the adequacy of access roadway surfaces and load- bearing capacity for expected traffic on-site. The facility must provide information regarding borings and analyses which verify that on-site and off-site roadway surfaces are capable of bearing the weights of trucks.

C WASTE CHARACTERISTICS

7. C-2a Waste Analysis Parameters and Rationale:
OAC 3745-54-13(B)(1);

The Part A permit and Part B permit application for the facility indicate that hazardous wastes having the waste codes D001, F001/F002, F003/F005, and F004 may also possess the toxicity characteristic for metal constituents found in OAC 3745-51-24 and 40 CFR 261.24 and that these hazardous wastes and those having the D002 waste code may also possess the characteristic of toxicity for organic constituents as defined in 40 CFR 261.24. However, the waste analysis plan does not indicate how hazardous wastes to be received by the facility will be evaluated to determine if they are also hazardous because of the characteristic of toxicity. In addition, no information is presented to establish that corrosive waste to be received by the facility are not also hazardous based upon the characteristic of toxicity for metal constituents. The waste analysis plan shall be revised to include all necessary information to establish that wastes received by the facility are being adequately characterized for the characteristic of toxicity.

8. C-2b Test Methods:
OAC 3745-54-13(B)(2);

The waste analysis plan shall be modified to include the test methods used to evaluate hazardous wastes to be received by the facility. Specifically, the following information is required:

a. The permit application refers to Hukill Chemical Corporation's Laboratory Manual. If possible, the HCC Laboratory Manual or appropriate sections of this document should be included as an appendix/exhibit to Section C.

b. The text in Section C of the permit application must reference appropriate appendices/exhibits or appropriate explanations for all appendices/exhibits must be provided in the permit application.

c. The methodology for determination of distillation range cannot be found in the appendix of Section C. The facility must provide this method in the permit application.

d. Quality assurance/quality control documentation to verify the accuracy of methods must be provided in the permit application (e.g., calibration of instruments, standards, blanks, controls, etc.).

e. Test methods for analyses of corrosive wastes must specify U.S.EPA publication SW-846, "Test Methods for Evaluating Solid Waste", as well as the specific method number.

f. Test method 7.3.3. for hydrocyanic acid evolution must be included in the permit application and the document from which this method is obtained must be identified in the permit application.

g. The methodology for determination of percent solids in corrosive wastes must be provided in the permit application or if methodology is the same as that for solvent wastes, this must be indicated in the permit application.

9. C-2c Sampling Methods:
OAC 3745-54-13(B)(3);

The permit application must be revised to include a description of the methods which will be used to sample bulk liquid shipments of waste acids in tanker trailers.

10. C-2e Additional Requirements for Wastes Generated Off-Site: OAC 3745-54-13(C);

The waste analysis plan must be revised to fully describe the protocols which will be used to analyze incoming wastes for the characteristic of toxicity. Specific analytical or documentation requirements for generators of off-site wastes received by the facility must be described.

11. C-3a(1) Waste Characteristics: Solvent Wastes and Dioxin-Containing Wastes: OAC 3745-54-13(A)(1); 3745-59-07(A); 3745-59-30 and 31; Appendix to 3745-59-07;

The waste analysis plan shall be revised to provide a complete description of the methods to be used to verify whether solvent wastes received by the facility are restricted from land disposal. This description shall include the following information:

a. Representative waste analyses from waste generators used to determine whether or not a waste is restricted from land disposal and the identification of the appropriate treatment standard;

b. For waste streams where generator knowledge is used to determine whether the waste is restricted from land disposal, representative information required from the generator to verify their classification of the waste;

c. Sample land disposal restriction notifications submitted to the facility and used by the facility for shipments of hazardous wastes off-site; and

d. A description of operational control procedures used to properly classify still bottoms, hazardous waste fuels, and other wastes generated by the facility for the purposes of compliance with the land disposal restriction regulations for F solvent wastes.

12. C-3a(2) Waste Characteristics: California List Wastes: OAC 3745-54-13(A)(1); 3745-59-07(A); 3745-54-32;

The waste analysis plan shall be revised to describe methods used to determine if wastes accepted by or generated by the facility are restricted from land disposal based upon the California list prohibitions specified in OAC 3745-59-[illegible]. This description shall include the following information:

a. Representative waste analyses from waste generators used to determine whether or not a waste is restricted from land disposal and the identification of the appropriate treatment standard;

b. For waste streams where generator knowledge is used to determine whether the waste is restricted from land disposal, representative information required from the generator to verify their classification of the waste;

c. Sample land disposal restriction notifications submitted to the facility and used by the facility for shipments of hazardous waste off-site; and

d. A description of operational control procedures used to properly classify still bottoms, hazardous waste fuels, and other wastes generated by the facility for the purposes of compliance with the land disposal restriction regulations for California list wastes.

13. C-3a(3) Waste Characteristics: First Third Wastes with Treatment Standards:
OAC 3745-59-33(A) through (E); 3745-59-07(A); 3745-59-41 through 43;

The waste analysis plan shall be revised to describe methods used to determine if first third wastes accepted by or generated by the facility are restricted from land disposal. This description shall include the following information:

a. Representative waste analyses from waste generators used to determine whether or not a waste is restricted from land disposal and the identification of the appropriate treatment standard;

b. For waste streams where generator knowledge is used to determine whether the waste is restricted from land disposal, representative information required from the generator to verify their classification of the waste;

c. Sample land disposal restriction notifications submitted to the facility and used by the facility for shipments of hazardous wastes off-site; and

d. A description of operational control procedures used to properly classify still bottoms, hazardous waste fuels, and other wastes generated by the facility for the purposes of compliance with the land disposal restriction regulations for first third wastes.

14. C-3a(4) Waste Characteristics: Second Third Wastes with Treatment Standards:
OAC 3745-3745-59-34(A) through (G); 3745-59-41 through 43; 40 CFR 268.34(a) through (g); 268.41 through 43;

The waste analysis plan shall be revised to describe methods used to determine if second third wastes accepted by or generated by the facility are restricted from land disposal. This description shall include the following information:

a. Representative waste analyses from waste generators used to determine whether or not a waste is restricted from land disposal and the identification of the appropriate treatment standard;

b. For waste streams where generator knowledge is used to determine whether the waste is restricted from land disposal, representative information required from the generator to verify their classification of the waste;

c. Sample land disposal restriction notifications submitted to the facility and used by the facility for shipments of hazardous wastes off-site; and

d. A description of operational control procedures used to properly classify still bottoms, hazardous waste fuels, and other wastes generated by the facility for the purposes of compliance with the land disposal restriction regulations for second third wastes.

15. C-3a(6) Waste Characteristics: Third Third Wastes with Treatment Standards:
40 CFR 268.35(a) through (j); 40 CFR 268.41 through 43;

The waste analysis plan shall be revised to describe methods used to determine if third third wastes accepted by or generated by the facility are restricted from land disposal. This description shall include the following information:

a. Representative waste analyses from waste generators used to determine whether or not a waste is restricted from land disposal and the identification of the appropriate treatment standard;

b. For waste streams where generator knowledge is used to determine whether the waste is restricted from land disposal, representative information required from the generator to verify their classification of the waste;

c. Sample land disposal restriction notifications submitted to the facility and used by the facility for shipments of hazardous wastes off-site; and

d. A description of operational control procedures used to properly classify still bottoms, hazardous waste fuels, and other wastes generated by the facility for the purposes of compliance with the land disposal restriction regulations for third third wastes.

16. C-3b(1) Retention of Generator Notices and Certifications:
OAC 3745-59-07(A);

The waste analysis plan shall be modified to describe record keeping protocols for land disposal restriction notifications received by the facility and provided to off-site facilities. The Part B permit application must specify how long land disposal restriction notifications will be maintained by the facility.

17. C-3b(2) Notification and Certification for Wastes to be Further Managed:
OAC 3745-59-07(B)(6);

The waste analysis plan shall be revised to describe protocols for the notification and certification regarding applicable land disposal restrictions for all hazardous wastes shipped from the facility to off-site facilities for further management. The Part B permit application indicates that sample land disposal restriction notifications can be found in the appendix to Section C. These documents cannot be found in the permit application and must be provided by the facility.

D PROCESS INFORMATION

18. D-1a(1) Description of Containers:
OAC 3745-55-71; 3745-55-72;

The permit application must be revised to include information regarding the approximate number of tote-type containers which will be managed in the solvent and corrosive waste drum storage areas. In addition, a description of the construction materials, dimensions and usable volumes, DOT or other manufacturer specifications, liner specifications (if applicable), container condition (new, used, reconditioned), and markings or labels which will be utilized must be provided for the tote-type containers.

19. D-1a(3)(a) Requirement for the Base or Liner to Contain Liquids:
OAC 3745-55-75(B)(1);

The permit application must be modified to provide information demonstrating the capability of the container storage areas to contain liquids. This demonstration shall include an engineering evaluation of the base design and construction materials as well as the adequacy of the patching of cracks in the east warehouse storage area. In addition, the application shall also be modified to include a demonstration that the base is compatible with the waste stored in the units or shall provide information regarding proposed treatment or coating of the base in each unit necessary to make it compatible with the wastes to be stored there.

The facility must demonstrate that the patching of cracks in the east warehouse storage area is adequate via an engineering evaluation. It is not clear from exhibits in Section D of the permit application whether the patching of cracks has been evaluated. The facility must demonstrate that container storage areas for solvents and corrosives have bases which are impermeable to hazardous materials stored in these areas. The permit application must also include descriptions of the specific coatings to be used in the container storage area for corrosives. In addition, the permit application must also demonstrate that the spark-proof coating in the container storage areas for solvents is impermeable or that the container storage areas will be coated with a material that renders the base impermeable to solvents.

20. D-2a Tank Systems Description:
OAC 3745-50-44(C)(2); 3745-55-94(A);

Provide a description of the material of construction of each proposed tank. Table D-1 indicates proposed tanks will be constructed of "CS" and "S/S". It is assumed that "CS" and "S/S" refer to carbon steel and stainless steel, respectively. The facility must provide interpretation of "CS" and "S/S" in Table D-1.

21. D-2a(1) Dimensions and Capacity:
OAC 3745-50-44(C)(2)(b);

Provide the dimensions and capacity of each tank. Section B-a describes six (6) 14,500 gallon tanks and one (1) 10,000 gallon tank for storage of spent solvent and off-specification organic chemical wastes. Section D, p. 18, describes six (6) 14,000 gallon tanks and one (1) 21,000 gallon tank in the same area. The facility must clarify the

volumes of these tanks. Figure F-11 indicates seven (7) 14,000 gallon tanks. The permit application must be modified to include tank V-120 rather than V-714. All figures in the permit application do not indicate that tank V-714 has been replaced by tank V-120.

22. D-2a(2) Description of Feed Systems, Safety Cutoff, Bypass Systems and Pressure Controls:
OAC 3745-50-44(C)(2)(c); 3745-55-94(B);

The permit application must be revised to describe measures used to provide for waste feed cutoff and/or bypass of the waste acid tank in emergency situations. Protocols, equipment, and structures used to prevent spills from the tank system and transfer equipment must also be described in the permit application.

23. D-2a(3) Diagram of Piping, Instrumentation, and Process-Flow:
OAC 3745-50-44(C)(2)(d);

Detailed diagrams of piping and instrumentation must be provided for the existing waste acid tank. These diagrams shall include all piping and appurtenant equipment such as hose connection, pumps, etc., and shall indicate the entire network of piping from loading areas to waste unloading areas or connections to process equipment. Instrumentation diagrams shall indicate the type and location of all instrumentation as well as any operator monitoring locations in the facility (i.e., the location of the placement of alarms monitored by the operators).

24. D-2b(1) Assessment of Existing Tank System Integrity:
OAC 3745-50-44(C)(2)(a); 3745-55-91;

The permit application shall be revised to include an assessment of the structural integrity and suitability of the existing waste acid tank for handling hazardous waste which has been reviewed by an independent, qualified, registered professional engineer which meets the requirements found in OAC 3745-55-91. For purposes of compliance with this requirement, Hukill Chemical Corporation may incorporate the applicable portions of the existing tank assessment submitted to Ohio EPA in May 1989 into the permit application. Ohio EPA is aware that this tank is currently not in service. The assessment is required in order to demonstrate that the existing waste acid tank is a viable structure which can in the future be managed as described in the permit application.

25. D-2d(1) Plans and Description of the Design, Construction, and Operation of the Secondary Containment System: OAC 3745-50-44(C)(2)(g); 3745-55-93(A) through (F);

A detailed as-constructed Plan Sheet for the secondary containment dike for tanks V-114, V-214, V-314, V-414, V-514, V- 614, and V-120 shall be included in the permit application to document compliance with requirements for secondary containment for tank systems at the facility.

26. D-2d(1)(c) Requirements for an External Liner, Vault, Double- Walled Tank or Equivalent Device: OAC 3745-50-44(C)(2)(g); 3745-55-93(D) and (E);

Table D-2 in Section D indicates that the secondary containment for the existing feed and bottoms storage area cannot contain 100 percent of the capacity of the largest tank. The secondary containment must be upgraded to comply with OAC 3745-50-44(C)(2)(g) and 3745-55-93(D) and (E).

The facility must provide the following information for the secondary containment system for the upgraded feed and bottoms tank storage area:

a. Present calculations to show that the secondary containment system is designed or operated to contain 100 percent of the capacity of the largest tank within its boundary;

b. Show that the secondary containment system is designed or operated to prevent run-on or infiltration of precipitation. Alternatively, show that the collection system has sufficient excess capacity to contain run-on and precipitation from a 25-year, 24-hour rainfall;

c. Show that the secondary containment system is free of cracks or gaps; and

d. Demonstrate that the system is designed and installed to surround the tank completely and to cover all surrounding soil likely to come in contact with the wastes if they were released from the tanks.

27. D-2d(2) Requirements for Tank Systems Until Secondary Containment is Implemented: OAC 3745-55-93(I);

The permit application must be revised to indicate that the existing spent acid tank and its ancillary equipment will be tested annually for leaks and/or assessed as required by OAC 3745-55-93(I)(2) and (3) until secondary containment is provided. Specific test methods to be utilized to meet this requirement must be presented.

F PROCEDURES TO PREVENT HAZARDS

28. F-2b(1) Container Inspection:
OAC 3745-55-74;

The application must be revised to include container storage area inspection forms. The application must contain the forms that are to be completed by personnel during an inspection.

29. F-2b(2) Tank System Inspection:
OAC 3745-55-95;

The application must be revised to include tank system inspection forms. The application must contain the forms that are to be completed by personnel during an inspection.

30. F-3a(3) Emergency Equipment:
OAC 3745-54-32(C);

Figure G-2 must be revised to show locations of:

a. Proposed additional emergency equipment for the proposed new hazardous waste management units at the facility.

b. Two fire fighting foam carts and two 80 pound BC powder fire extinguisher carts.

31. F-4a Unloading Operations:
OAC 3745-50-44(A)(8)(a);

Figure F-6 indicates that there are two valves on each unloading pipe for tanks in the existing tank farm. The revised text on page 10 of Section F explains that the valve at the tank is normally kept open. The other valves are used for flow control. The application must be revised to indicate that flow control valves shall be kept closed when the tanks are not being unloaded.

G CONTINGENCY PLAN

32. G-4c Assessment:
OAC 3745-54-56(C) and (D);

The contingency plan shall be revised to provide specific guidelines to be used by the emergency coordinator to assess emergency situations at the facility. These guidelines shall include criteria for notification of local emergency service authorities and the Ohio EPA Emergency Response Section. In addition, criteria to be considered for determining the need for evacuation of the facility or surrounding areas shall be described.

33. G-4e Prevention of Reoccurrence or Spread of Fires, Explosions, or Releases:
OAC 3745-54-56(E);

The specific procedures which will be employed at the facility to prevent the spread of fires and explosions to other areas of the facility shall be described in the contingency plan. Aside from moving containers to other areas of the facility, are any other procedures followed to prevent the spread of fires and explosions to other areas of the facility? Can unaffected areas of the facility be isolated via doors or some other device which may impede the spread of fires and/or explosions?

34. G-4f Storage and Treatment of Released Materials:
OAC 3745-54-56(G);

Specific procedures to be utilized to recover released materials at the facility must be described in the contingency plan. By what method will contaminated soil or residue be collected for placement in storage containers? Also, a more thorough discussion of the methods to be used to evaluate released materials for disposal following recovery must be provided.

35. G-4j(5) Provision of Secondary Containment, Repair, or Closure :
OAC 3745-55-96(E);

The permit application must define what constitutes a "major" repair as discussed on page 10 of Section G.

I CLOSURE PLANS, POST-CLOSURE PLANS, AND FINANCIAL REQUIREMENTS

36. I-1a Closure Performance Standard:
OAC 3745-55-11;

The closure plan does not thoroughly describe how closure will meet the closure performance standard. Sections of the EA closure plan which are referenced in the permit application closure plan must be incorporated into the permit application. Also, all proposed hazardous waste management units and the hazardous waste fuels blending units must be included in the closure plan in the permit application.

37. I-1c Maximum Waste Inventory:
OAC 3745-55-12(B)(3);

The maximum waste inventory describes the maximum inventory of wastes that could be in storage, treatment, and disposal at any time during the active life of the facility. The maximum waste inventory should not encompass contaminated materials generated during closure activities. The closure plan must be revised to describe the maximum inventory of wastes that could be in storage, treatment, and disposal at any time during the active life of the facility. The maximum inventory of wastes must include wastes in storage, treatment, and disposal in existing and proposed hazardous waste management units and in existing and proposed hazardous waste fuels blending units.

38. I-1d Schedule for Closure:
OAC 3745-55-12(B)(6);

The schedule for closure of the facility shall be revised in accordance with revisions made to the facility closure plan as the result of the comments provided herein.

39. I-1e(1) Inventory Removal:
OAC 3745-55-12(B)(3);

The closure plan must be revised to include proposed hazardous waste management units and fuel blending units in discussions of inventory removal. The revision must include a discussion of the methods which will be used to remove, transport, treat, store, or dispose of these wastes at the facility at the time of closure and identify the types of off- site hazardous waste management units to be used for treatment or disposal of hazardous wastes from the facility.

The closure plan must describe on-site processing of recyclable wastes from existing and proposed hazardous waste management units and hazardous waste fuels blending units, and provide estimated maximum quantities of wastes considered to be recyclable on-site.

40. I-1e(2) Disposal or Decontamination of Equipment, Structures, and Soils:
OAC 3745-55-12(B)(4); 3745-55-14;

The closure plan must be revised to provide a detailed description of the steps needed to decontaminate or dispose of all equipment associated with the existing and proposed hazardous waste management units at the facility. This description shall include the following information:

a. A complete description of all existing, proposed, and fuels blending hazardous waste management units at the facility to be closed as identified in the Part A

application, including: a list of associated equipment; detailed drawings of the units to be closed and all ancillary equipment; a description of the period of use, identification of the hazardous wastes managed in the unit (by EPA identification number and chemical name); pertinent physical data and construction details; and a description of underlying soils and site geology. Text and drawings in other sections of the permit application can be referred to in the description;

b. Decontamination procedures for structures and equipment (proposed and fuels blending tanks);

c. Criteria for determining whether structures, equipment, or underlying soils are contaminated (existing, proposed, and fuels blending). The closure plan must describe methods for sampling and analyzing containment structures and underlying soils for contaminants;

d. Management practices for wastes generated during closure (existing, proposed, and fuels blending). The closure plan must describe methods for management (including collection and storage) of rinseates, structures, and soils which may be generated during closure activities;

e. Methods and criteria for the verification of the effectiveness of closure activities (existing, proposed, and fuels blending). The closure plan must specify the degree and extent of contamination which would result in a decision to close the facility as a landfill; and

f. Quality assurance/quality control procedures for the implementation of closure, including sample collection and analyses (proposed and fuels blending).

41. I-1e(3) Closure of Disposal Units/Contingent Closures: OAC 3745-55-78; 3745-55-97(B); 3745-55-12(C); 3745-50-44(A)(13);

The closure plan shall be revised to describe how the facility shall implement closure and post-closure care should information gathered during closure activities indicate that it will be necessary to close any of the hazardous waste management units as a landfill. In addition, the closure plan should also provide for the contingency of the use of health-based risk assessments for the demonstration of clean closure. The permit application must include the specific sections of the EA closure plan which address requirements discussed herein. If necessary, this information must be revised to incorporate all existing and proposed hazardous waste management units and hazardous waste fuels blending units.

42. I-1e(4) Closure of Containers:
OAC 3745-55-78, 3745-55-12(B)(3);

For all proposed container storage units, show that at closure all hazardous waste and hazardous waste residues will be removed from the containment system, and how remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed. The description shall address the following:

a. Hazardous waste removal and disposal;

b. Container decontamination and disposal;

c. Site decontamination and disposal including linings, soil, and rinseates; and

d. Verification of decontamination.

In addition, the closure plan for existing and proposed container storage units must describe methods for sampling containment structures and soils, and management protocols for wastes generated during closure, including waste collection and storage procedures.

43. I-1e(5) Closure of Tanks:
OAC 3745-55-97; 3745-55-12(B)(3);

For all proposed tank storage units and hazardous waste fuels blending tanks, describe how all hazardous waste residues, contaminated containment system components (liners, etc.), contaminated soils, and structures and equipment contaminated with waste will be removed or decontaminated at closure and managed as hazardous waste. The description shall address the following:

a. Waste removal from tanks and equipment;

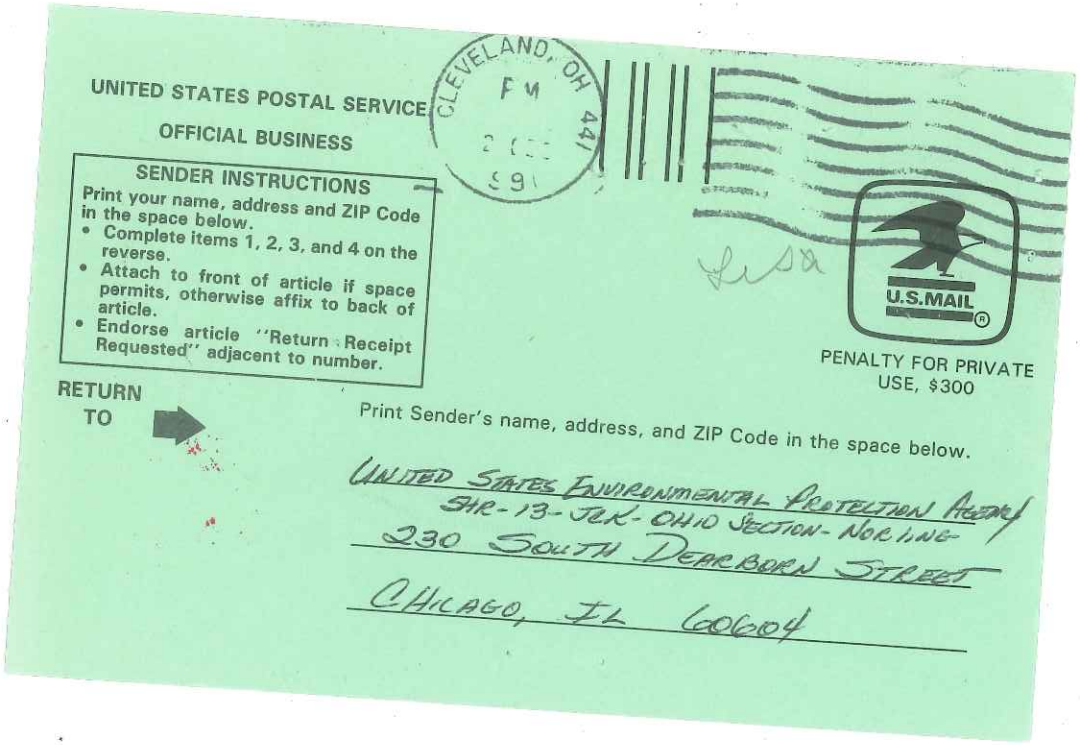
b. Decontamination of all components;

c. Verification of decontamination; and

d. Disposal of wastes and residues.

In addition, the closure plan for existing and proposed tank storage units and hazardous waste fuels blending tanks must describe methods for sampling containment structures and soils, and management protocols for wastes generated during closure, including collection and storage procedures.

END OF TECHNICAL ADEQUACY COMMENTS



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ROBERT L. HUKILL
HUKILL CHEMICAL CORP.
7013 KRICK ROAD
BEDFORD, OHIO 44146

4. Article Number

P664 395 532

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5HR-13

Robert L. Hukill
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

RE: Request for Subpart AA and BB Information
Hukill Chemical Corporation
OHD 001 926 740

Dear Mr. Hukill:

On June 21, 1990, the United States Environmental Protection Agency (U.S. EPA) promulgated a rule in 55 Federal Register 25454, limiting organic air emissions as a class at hazardous waste treatment, storage, and disposal facilities requiring a permit under Subtitle C of the Resource Conservation and Recovery Act (RCRA). The effective date for this rule was December 21, 1990.

The U.S. EPA is formally requesting that Hukill Chemical Corporation, submit information required by 40 CFR Parts 270.14, 270.24 and 270.25 that will show compliance with the air emissions rules, Subparts AA and BB.

Enclosed is a checklist of Subparts AA and BB information requirements that you may use as a guideline in preparing your submittal. The Subparts AA and BB information requirements must be submitted to the following address within thirty (30) days of receipt of this letter.

RCRA Permitting Branch (5HR-13)
U.S. Environmental Protection Agency
230 S. Dearborn
Chicago, Illinois 60604

Attn: Francine P. Norling

Please be advised that the December 21, 1990, date is applicable to the requirements to develop and implement a monitoring plan for equipment leaks, to identify any process vents included in the process vent rules, to develop emission calculations for those affected vents, and the identification of control technology, if required. These records may be submitted in

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partial/complete fulfillment of the 40 CFR Parts 270.24 and 270.25 requirements.

Information you submit can be disclosed to the public, according to the Freedom of Information Act and U.S. EPA Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. U.S. EPA will review business confidentiality claims under regulations in 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

We will coordinate review of this information with your Part B application that is currently under review by the Ohio Environmental Protection Agency. If your submittal is acceptable, we will strive for a simultaneous issuance of Federal and State hazardous waste facility permits. If, during the processing of your application, the State hazardous waste program becomes authorized to issue RCRA permits for the air emission rules, direct Federal processing will cease, and the State in lieu of U.S. EPA will make the final determination on your application. In either case, please be aware that all State and local requirements still apply.

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently, I suggest you contact Francine P. Norling, of my staff, at (312) 886-6198, if you have questions concerning your submittal. We look forward to receiving this information.

Sincerely,

Karl E. Bremer, Chief
RCRA Permitting Branch

Enclosure

cc: Kris Switzer, OEPA-NEDO
Ed Lim, OEPA-CO

HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD • BEDFORD, OHIO 44146-4493 • 216 / 232-9400 • FAX 216 / 232-9477

Over Forty Years of Quality Products and Services

June 13, 1991

Ms Lisa Pierard
RCRA Activities
Part B Application
U.S. EPA - Region V 5HR-13
230 South Dearborn Street
Chicago, Illinios 60604

Dear Ms Pierard:

I have enclosed the requested information in response to the Technical Adequacy Comments for Hukill Chemical Corporation's Part B Application re Mr. Ed Lim's memo to Robert L. Hukill, dated March 11, 1991.

In response to the comments, we have revised the text for sections B, C, D, F, G and H. The text for all these sections has been completely reprinted and enclosed as indicated by the dividers.

Four new or revised Plan Sheets on D size drawings, numbers 1A, 2A, 11C and 12, are inserted in the notebook pockets which will fit the existing Plan Sheet Book.

The new and revised Exhibits, etc., are included with and following the text for each section.

We have provided an "Index of Part B Appendices" which is attached to the front of the enclosure. Those Exhibits, Plan Sheets, Figures and Tables which are new or revised for this revision are marked with an asterisk.

Section I, "Closure Plan and Closure Cost Estimates" has not been revised. We received the "Closure Plan Review Guidance", May 1, 1991 issue, on June 7. It was ordered on May 16. We will review this new guidance document and then revise the Closure Plan section of the Part B Application in response to the Technical Adequacy Comments. I advised Kristen Switzer of this. I do not expect that the later submission of the Closure Section will hold up the Ohio EPA review process.

If there are any questions or comments regarding the enclosed, please contact me at Hukill Chemical, (216) 232-9400.

I met with Paul Anderson and Kristen Switzer at the Northeast District Office on April 1, 1991, to discuss the Technical Adequacy Comments. During this meeting, we addressed the comment number 46(a). I explained that although the fill/discharge lines for the tanks contain two valves, HCC uses the valve nearest the tank as an emergency shut-off valve. We do not feel that it is safe or practical to have the Operator climb into the dike to open or close this valve each time he begins and ends a transfer to the storage tank. Paul suggested that I include this comment on this cover letter.

Sincerely yours,

Edgar M. Price
Engineering Consultant

enclosures:

cc: Robert L. Hukill, President
Kristen Switzer, Ohio EPA, NEDO
Tom Crepeau, Ohio EPA, DSHWM
Nick Andrianas, Eder Associates

OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Francine

May 24, 1991

RE: Amendement to NOD Extension
US ID: OHD 001 926 740
OHIO ID: OHIO 02-18-0315

Edgar M. Price
Engineering Consultant
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146-4493

Dear Mr. Price:

In a letter dated May 20, 1991, Hukill Chemical was given an extension for submitting a response to an Ohio EPA Notice of Deficiency dated March 11, 1991. The new due date was set at June 3, 1991.

On May 24, 1991, you stated via telephone that, although you did not state the number of days required in your May 10, 1991 extension request, at least 30 days extension would be necessary. The Ohio EPA agrees that the June 3, 1991 due date is considerably less than the 30 days extension you intended. Therefore, the Ohio EPA respectfully requests Hukill Chemical Corporation's cooperation in addressing the deficiencies of the Part B application by June 13, 1991.

Please be advised that failure to submit a complete permit application or to correct deficiencies in the application may result in (1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, (2) denial of the application for permit renewal, (3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action, or (4) your application for a renewal permit may be returned as incomplete.

When responding to the Part B deficiencies, if you have any questions regarding the permit application, please feel free to contact Kristin Switzer, Ohio EPA, NEDO at (216) 425-9171.

Sincerely,

Edwin Y. Lim, Manager
RCRA Engineering Section
Division of Solid and Hazardous Waste Management

cc: Lisa Pierard, U.S. EPA
Tehmton Toorkey, CO, DSHWM, OEPA
Frank Basting, CO, DSHWM, OEPA
Kristin Switzer, NEDO, DSHWM, OEPA

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OhioEPA
State of Ohio Environmental Protection Agency

O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Francine

May 20, 1991

RE: Hukill Extension to NOD
US ID: OHD001926740
OHIO ID: 02-18-0315

Edgar M. Price
Engineering Consultant
Hukill Chemical Corp.
7013 Krick Road
Bedford, Ohio 44146-4493

Dear Mr. Price:

On March 11, 1991 Hukill Chemical Corp. was sent a Notice of Deficiency (NOD) by the Ohio Environmental Protection Agency (Ohio EPA), following a technical adequacy review of the Part B application. In a letter dated May 10, 1991, you requested an extension for submitting a response to the NOD comments. The Ohio EPA, through the normal course of the permitting process, allows 55 days for a facility to respond to a NOD.

As you may know, the permitting process requires a timely interaction between the Ohio EPA and any facility seeking a permit. Any delay in the NOD response will only impede the progress of the permitting procedure. The Ohio EPA realizes that certain unforeseen events may develop during the permit application process and the agency will usually not object to a reasonable extension of the due date. The Ohio EPA respectfully requests Hukill Chemical Corporation's cooperation in addressing the deficiencies of the Part B application by June 3, 1991 so that the Agency may continue the permitting procedure and remain within agency time commitments.

Please be advised that failure to submit a complete permit application or to correct deficiencies in the application may result in (1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, (2) denial of the application for permit renewal, (3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action, or (4) your application for a renewal permit may be returned as incomplete.

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When responding to the Part B deficiencies, if you have any questions regarding the permit application, please feel free to contact Kristin Switzer, NEDO at (216) 425-9171.

Sincerely,

Edwin Y. Lim, Manager
RCRA Engineering Section
Division of Solid and Hazardous Waste Management

cc: Lisa Pierard, U.S. EPA
Themton Toorkey, CO, DSHWM
Frank J. Basting, CO, DSHWM, OEPA
Kristin Switzer, NEDO, DSHWM, OEPA

OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

CERTIFIED MAIL

March 11, 1991

RE: Hukill Chemical Corp.
OHIO ID: 02-18-0315
USEPA ID: OHD 001 926 740

Robert L. Hukill
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

Dear Mr. Hukill:

Thank you for submitting Part B of the Resource Conservation and Recovery Act (RCRA) permit application for your facility pursuant to both the State and Federal Part B call-in.

As you may know, Ohio has been delegated authority to operate its hazardous waste management program in lieu of the Federal hazardous waste program. Ohio now has the responsibility for issuing RCRA permits for hazardous waste treatment, storage and disposal facilities subject to the authority retained by U.S. EPA under the Hazardous and Solid Waste Amendments of 1984 (HSWA) to RCRA. Since the requirements and prohibitions imposed by HSWA are effective immediately regardless of a State's authorization status, U.S. EPA will continue to implement the applicable HSWA requirements. In other words, under HSWA there will continue to be a dual State-Federal regulatory program in Ohio. To the extent Ohio's authorized program is unaffected by HSWA, the Ohio program will operate in lieu of the Federal program. To the extent HSWA-related requirements are in effect, U.S. EPA will continue to administer and enforce those portions of HSWA in Ohio (which may include the issuance of full or partial permits) until Ohio receives authorization to do so. And until that time, Ohio will continue to assist U.S. EPA's implementation of the HSWA requirements under a cooperative agreement.

The Ohio EPA Division of Solid and Hazardous Waste Management has conducted a technical adequacy review of your Part B application and has determined it to be inadequate. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapters in the Ohio Administrative Code and the corresponding Federal regulations.

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We have enclosed technical adequacy comments that are the result of this review. Please provide detailed information addressing all areas indicated on the comment sheets to Ohio EPA within 55 days of the date of receipt of this correspondence. This submission shall be in accordance with the following editorial protocol or convention:

1. Old language is overstruck.

2. New language is capitalized.

3. Page headers should indicate date of submission.

4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

Please send one copy each to:

Tom Crepeau
Ohio EPA, DSHWM
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-0149

Lisa Pierard
RCRA Activities
Part B Application
U.S. EPA - Region V 5HR-13
230 South Dearborn Street
Chicago, Illinois 60604

Please send two copies to:

Kristin Switzer
Ohio EPA, Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

In the course of the technical adequacy review, we may request additional information from you if it is necessary to clarify, modify or supplement previous submissions of information in order to substantively evaluate the permit application for adequacy.

Failure to submit a complete permit application or to correct deficiencies in the application may result in the following: 1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, 2) denial of the application for a renewal permit, 3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action.

If you have any questions concerning the review of the permit application, or the level of detail we expect, please do not hesitate to contact Kristin Switzer, NEDO, at (216) 425-9171. We also request that the facility contact the above referenced person, and discuss each of the enclosed comments in order to make clear the information being requested. This can be accomplished by a conference call or meeting.

Finally, as you may know, Ohio's hazardous waste law was recently amended to authorize the Attorney General to conduct background investigations on permittees and applicants for permits for hazardous waste treatment, storage and disposal facilities. Ohio Revised Code 3734.42 requires every applicant to file a disclosure statement with both the Ohio EPA and the Attorney General on a form developed by the Attorney General.

Rules 109:6-1-01 to 109:6-1-04 were promulgated by the Attorney General to implement the background investigations program. These rules, effective March 3, 1989, provide that if you file a permit application on or after 180 days after the effective date of the rules, i.e. after September 3, 1989, then your application for a permit must be accompanied by the required disclosure statement.

Since you have filed a permit application before September 3, 1989, then your disclosure statement shall be filed with the Attorney General on or before the date specified in a written notice to be sent by the Attorney General in accordance with Ohio Revised Code 3734.42.

For information concerning Rules 109:6-1-01 to 109:6-1-04, the disclosure statements and the Attorney General's procedures for written notice, please contact Mr. Athan Vinolus at the Attorney General's Environmental Enforcement Section, at 30 East Broad Street, Columbus, Ohio 43215, or at (614)466-2766.

Ohio EPA will continue to process your application without a disclosure statement. The permit application and the findings made in accordance with Ohio Revised Code 3734.05(H)(1) and 3734.44 will form the basis for Ohio EPA's determination on the permit. An investigative report will be developed by the Attorney General and evaluated for the permit. Please be advised that future review of the investigative report and disclosure statement developed for this permit may form the basis for revocation of the permit, where applicable, pursuant to Ohio Revised Code 3734.45.

Sincerely,

Edwin Y. Lim

Edwin Y. Lim, Manager
RCRA Engineering Section
Division of Solid and Hazardous Waste Management

cc: Lisa Pierard, U.S. EPA
Joel Morbito, U.S. EPA
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PART B REVIEW COMMENTS
HUKILL CHEMICAL CORP.
02-18-0315/OHD 001 926 740
TECHNICAL ADEQUACY COMMENTS

1. A **Part A Application**
[OAC 3745-50-43]

Plan Sheet 2 of the Part A application must be modified to include a scale drawing of all past, present and future treatment, storage and disposal areas located at the facility as required by OAC 3745-50-43 (A)(4). The current diagram only includes areas used at present.

2. A **Part A Application**
[OAC 3745-50-43]

The Part A application must be modified to include detailed photographs of all existing treatment, storage and disposal areas located at the facility as required by OAC 3745-50-43 (A)(5).

3. B-1 **General Facility Description**
[OAC 3745-50-44 (A)(1)]

The general facility description must be revised to include a brief description of the hazardous waste units at the facility which require a permit. This description must include the types of units, types of wastes stored and other pertinent general information.

4. B-2a **Topographic Map, General Requirements**
[OAC 3745-50-44 (A)(19)]

The plan sheets provided indicate topography only for existing conditions and not following the modifications proposed for the facility. For purposes of the permit application, identical plan sheets indicating existing and proposed facility conditions must be provided for the following information required by OAC 3745-50-44 (A)(19):

a. Surface water flow in the vicinity of and from each operational unit;

b. Surrounding land uses;

c. A wind rose;

d. The location of all monitoring wells within the facility;

e. The location of all storm, sanitary and process sewers;

f. Fire control facilities; and

g. Run-off control systems.

5. B-2a **Topographic Map, General Requirements**
[OAC 3745-50-44 (A)(19)]

Plan Sheet 5 was not included in the permit applicat

6. B-4 **Traffic Information**
[OAC 3745-50-44 (A)(10)]

The traffic information for on-site vehicle traffic is presented only for the current site conditions. This description does not include a description of the types of vehicles and estimated traffic volumes as required. In addition, traffic information must be provided for the anticipated conditions following the proposed changes to the facility. This information must include the following:

a. Anticipated traffic patterns on-site;

b. Estimated volumes, including the number and types of vehicles;

c. Traffic control signs, signals, and procedures;

d. Adequacy of access roadway surfaces and load-bearing capacity for expected traffic on-site.

7. C-1a **Containerized Waste Containing No Free Liquids**
[OAC 3745-50-44 (C)(1)(b)]

The facility waste analysis plan shall be revised to include waste analysis data from testing of drums stored in the East Pad area indicating that these drums do not contain free liquids. In addition, the waste analysis plan shall be revised to include a description of the waste analysis procedures used to determine that these wastes do not contain free liquids prior to their being placed into storage.

8. C-1b **Hazardous Characteristics for Wastes Stored in New Tank Systems** [OAC 3745-55-92 (A)(2)]

The waste analysis plan shall be modified to indic[illegible] the characteristics of the hazardous wastes to be stored in the n[illegible] tank systems proposed for the facility.

9. C-2a **Waste Analysis Parameters and Rationale**
[OAC 3745-54-13 (B)(1)]

The Part A application for the facility indicates that hazardous wastes having the waste codes D001, F001/F002, F003/F005, and F004 may also possess the toxicity characteristic for metal constituents found in OAC 3745-51-24 and 40 CFR 261.24 and that these hazardous wastes and those having the D002 wastes code may also possess the characteristic of toxicity for organic constituents as defined in 40 CFR 261.24. However, the waste analysis plan does not indicate how hazardous wastes to be received by the facility will be evaluated to determine if they are also hazardous because of the characteristic of toxicity. In addition, no information is presented to establish that corrosive waste to be received by the facility are not also hazardous based upon the characteristic of toxicity for metal constituents. The waste analysis plan shall be revised to include all necessary information to establish that wastes received by the facility are being adequately characterized for the characteristic of toxicity.

10. C-2b **Test Methods**
[OAC 3745-54-13 (B)(2)]

The waste analysis plan shall be modified to include the test methods used to evaluate hazardous wastes to be received by the facility. This shall include reference to appropriate testing procedures found in U.S.EPA Publication SW-846 "Test Methods for Evaluating Solid Wastes" or alternate equivalent published procedures. In instances where site specific analytical methods have been developed, these methods shall be provided in the permit application along with quality assurance/quality control documentation developed by the laboratory to verify the accuracy of these methods.

11. C-2c **Sampling Methods**
[OAC 3745-54-13 (B)(3)]

The permit application must be revised to include a description of the methods which will be used to sample bulk liquid shipments of waste acids (tanker trailers) and tote containers.

12. C-2e **Additional Requirements for Wastes Generated Off-Site**
[OAC 3745-54-13 (C)]

The waste analysis plan must be revised to fully describe the protocols which will be used to analyze incoming wastes for the characteristic of toxicity. Specific analytical or documentation requirements for generators of off-site wastes received by the facility must be described.

13. C-2f **General Requirements for Ignitable, Reactive or Incompatible Wastes** [OAC 3745-54-13 (B)(6) and 3745-54-17]

The Waste Analysis Plan shall be modified to present a protocol used to meet the additional waste analysis requirements for ensuring that containerized ignitable or incompatible wastes are not placed into the same tank in a manner which could result in a reaction as specified in OAC 3745-54-17 (B). Protocols are provided for testing the compatibility of containerized wastes destined for hazardous waste fuels blending and for acid/base neutralization. However, no protocol is presented for solvent wastes destined for distillation and/or recycling.

14. C-3a(1) **Waste Characteristics: Solvent Wastes and Dioxin- Containing Wastes** [OAC 3745-54-13 (A)(1), 3745-59-07 (A), 3745-59-30, 3745-59-40]

The waste analysis plan shall be revised to provide a complete description of the methods to be used to verify whether solvent wastes received by the facility are restricted from land disposal. This description shall include the following information:

a. representative waste analyses from waste generators used to determine whether or not a waste is restricted from land disposal and the identification of the appropriate treatment standard;

b. for waste streams where generator knowledge is used to determine whether the waste is restricted from land disposal, representative information required from the generator to verify their classification of the waste;

c. sample land disposal restriction notifications submitted to the facility and used by the facility for shipments of hazardous wastes off site; and

d. a description of operational control procedures used to properly classify still bottoms, hazardous waste fuels, and other wastes generated by the facility for the purposes of compliance with the land disposal restriction regulations for F solvent wastes.

15. C-3a(2) **Waste Characteristics: California List Wastes [OAC 3745-54-13 (A)(1), 3745-59-07 (A), 3745-59-32].**

The waste analysis plan shall be revised to describe methods used to determine if wastes accepted by or generated by the facility are restricted from land disposal based upon the California list prohibitions specified in OAC 3745-59-32. This description shall include the following information:

a. representative waste analyses from waste generators used to determine whether or not a waste is restricted from land disposal and the identification of the appropriate treatment standard;

b. for waste streams where generator knowledge is used to determine whether the waste is restricted from land disposal, representative information required from the generator to verify their classification of the waste;

c. sample land disposal restriction notifications submitted to the facility and used by the facility for shipments of hazardous wastes off site; and

d. a description of operational control procedures used to properly classify still bottoms, hazardous waste fuels, and other wastes generated by the facility for the purposes of compliance with the land disposal restriction regulations for California list wastes.

16. C-3a(3) **Waste Characteristics: First Third Wastes with Treatment Standards [OAC 3745-54-13 (A)(1), 3745-59-33 (A) through (E), 3745-59-07 (A), 3745-59-41 to 43].**

The waste analysis plan shall be revised to describe methods used to determine if first third wastes accepted by or generated by the facility are restricted from land disposal. This description shall include the following information:

a. representative waste analyses from waste generators used to determine whether or not a waste is restricted from land disposal and for the identification of the appropriate treatment standard;

b. for waste streams where generator knowledge is used to determine whether the waste is restricted from land disposal, representative information required from the generator to verify their classification of the waste;

c. sample land disposal restriction notifications subm ed to the facility and used by the facility for shipments of ha dous wastes off site; and

d. a description of operational control procedures u to properly classify still bottoms, hazardous waste fuels, a ther wastes generated by the facility for the purposes of co ce with the land disposal restriction regulations for first t astes.

17. C-3a(4) **Waste Characteristics: Second Third Wa with Treatment Standards [OAC 3745-54-13 (A)(1), 3745-59 4 (A) through (G), 3745-59-34 (I), 3745-59-41 to 43]**

The waste analysis plan shall be revised to describe methods used to determine if second third wastes accepted by or generated by the facility are restricted from land disposal. This description shall include the following information:

a. representative waste analyses from waste generators used to determine whether or not a waste is restricted from land disposal and for the identification of the appropriate treatment standard;

b. for waste streams where generator knowledge is used to determine whether the waste is restricted from land disposal, representative information required from the generator to verify their classification of the waste;

c. sample land disposal restriction notifications submitted to the facility and used by the facility for shipments of hazardous wastes off site; and

d. a description of operational control procedures used to properly classify still bottoms, hazardous waste fuels, and other wastes generated by the facility for the purposes of compliance with the land disposal restriction regulations for second third wastes.

18. C-3b(1) **Retention of Generator Notices and Certifications [OAC 3745-59-07 (A)]**

The waste analysis plan shall be modified to describe record keeping protocols for land disposal restriction notifications received by the facility and provided to off-site facilities.

19. C-3b(2) **Notification and Certification for Wastes to be Further Managed** [OAC 3745-59-07 (B)(6)]

The waste analysis plan shall be revised to describe protocols for the notification and certification regarding applicable land disposal restrictions for all hazardous wastes shipped from the facility to off-site facilities for further management.

20. C-3c(1) **Restricted Wastes Stored in Containers** [OAC 3745-59-50 (A)]

The waste analysis plan shall be revised to document that restricted wastes are stored in containers solely for the purpose of accumulating sufficient quantities of the waste to facilitate proper disposal, treatment or recovery as required by OAC 3745-59-50. In addition, the facility must provide protocols indicating that each container will be clearly marked to identify its contents and the date that the container entered into storage.

21. C-3c(2) **Restricted Wastes Stored in Tanks** [OAC 3745-59-50 (A)(2)(b)]

The waste analysis plan shall be revised to demonstrate that each tank will be clearly marked with a description of its contents, the quantity and type of each hazardous waste received, and the date of each accumulation period. Alternatively, the permit may demonstrate that such information for each tank will be recorded and maintained in the operating record of the facility.

22. D-1a(1) **Description of Containers** [OAC 3745-55-71 and 3745-55-72]

The permit application must be revised to include information regarding the approximate number of tote-type containers which will be managed in the solvent and corrosive waste drum storage areas. In addition, a description of the construction materials, dimensions and usable volumes, DOT or other manufacturer specifications, liner specifications (if applicable), container condition (new, used or reconditioned) and markings or labels which will be utilized must be provided for the tote-type containers.

23. D-1a(3)(a) **Requirement for Base or Liner to Contain Liquids**
[OAC 3745-55-75 (B)(1)]

The permit application must be modified to provide information demonstrating the capability of the container storage areas to contain liquids. This demonstration shall include an engineering evaluation of the base design and construction materials as well as the adequacy of the patching of cracks in the east warehouse storage area. In addition, the application shall also be modified to include a demonstration that the base is compatible with the waste stored in the units or shall provide information regarding proposed treatment or coating of the base in each unit necessary to make it compatible with the wastes to be stored there.

24. (D-2a) **Tank Systems Description**
[OAC 3745-50-44 (C)(2), 3745-55-94 (A)]

The description of tank systems presented in the permit application must be revised to provide the location of each tank system currently at the facility as well as detailed location information for each new tank system. The figures in the permit application do not indicate that tank V-714 has been replaced by tank V-120. In addition, a description and diagrams indicating the precise volume and location for all proposed new tank systems at the facility must be provided, as well as more detailed descriptions of the construction and design of the tanks in the proposed new corrosive waste tank farm.

25. D-2a(1) **Dimensions and Capacity of Each Tank**
[OAC 3745-50-44 (C)(2)(b)]

The description of the dimensions and capacity of the proposed new corrosive waste storage tanks at the facility is vague and must be revised. The maximum volume for these tanks must be clearly indicated in the permit application, and a thorough description of acceptable design parameters for these tanks must be provided. In addition, acceptable design criteria for shell thickness for all of the proposed new tank systems shall be provided. Information shall be incorporated by reference into applicable sections of section D to provide shell thickness data for existing tanks at the facility.

26. D-2a(2) **Description of Feed Systems, Safety Cutoff, Bypass Systems, and Pressure Controls** [OAC 3745-50-44 (C)(2)(c), 3745-55-94 (B)]

The permit application must be revised to provide a complete description of the waste feed system for all existing and proposed tanks at the facility, including the types and locations of all pumps, valves, piping and other equipment used in the transfer of wastes. In addition, measures used to provide for waste feed cutoff and/or bypass in emergency situations must be described, as well as the protocols, equipment and structures used to prevent spills from the tank systems and transfer equipment.

27. D-2a(3) **Diagram of Piping, Instrumentation and Process Flow** [OAC 3745-50-44 (C)(2)(d)]

Process flow diagrams must be provided for all existing and proposed tanks included in the permit application. In cases where process flow varies depending upon the type of waste managed in a particular tank system, all scenarios for process flow shall be presented. Where several tanks serve the same function, the process flow description may be generalized, but detailed diagrams of piping and instrumentation for all existing and proposed tank systems must be provided. These diagrams shall include all piping and appurtenant equipment such as hose connections, pumps, etc., and shall indicate the entire network of piping from loading areas to waste unloading areas or connections to process equipment. Instrumentation diagrams shall indicate the type and location of all instrumentation as well as any operator monitoring locations in the facility (i.e. the location of the placement of alarms monitored by the operators).

In cases where piping or instrumentation for proposed new tank systems may vary dependent upon final design of the tank system, the diagrams and text of the permit application shall clearly indicate that these diagrams may be subject to change and that final construction diagrams will be submitted to Ohio EPA for review and approval prior to installation. A schedule for the submittal of these diagrams to Ohio EPA (in relation to the anticipated starting date for construction) shall be provided.

28. D-2a(4) **Ignitable, Reactive and Incompatible Wastes** **[OAC 3745-50-44 (C)(2)(j), 3745-54-17 (B), 3745-55-98 and 99]**

The permit application shall be revised to provide worksheets demonstrating that each existing and proposed tank system storing ignitable wastes will be located in compliance with the requirements for protective distances required in Tables 2- 1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code".

29. D-2b(1) **Assessment of Existing Tank System Integrity** **[OAC 3745-50-44 (C)(2)(a), 3745-55-91]**

The permit application shall be revised to include an assessment of the structural integrity and suitability of the existing waste acid tank for handling hazardous waste which has been reviewed by an independent, qualified, registered professional engineer which meets the requirements found in OAC 3745-55-91. For purposes of compliance with this requirement, Hukill Chemical may incorporate the applicable portions of the existing tank assessment submitted to Ohio EPA in May 1989 into the permit application.

30. D-2c(1) **Assessment of New Tank System Integrity** **[OAC 3745-50-44 (C)(2)(a) and (e), 3745-55-92 (A)]**

The permit application shall be revised to provide a schedule for the submission of integrity assessments for new tank systems to Ohio EPA prior to the commencement of construction. This schedule shall indicate dates for submission in relation to the anticipated starting date for construction. In addition, the permit application shall be revised to outline the contents of the tank integrity assessments to document compliance with applicable requirements.

31. D-2c(2) **Description of Tank System Installation and Testing Plans and Procedures** [OAC 3745-50-44 (C)(2)(f), 3745-55-92 (B) to (E)]

The permit application must be revised to provide the following information:

a. a demonstration that proper handling procedures will be adhered to during installation of new tank systems to prevent damage to the systems;

b. documentation that an independent, qualified, registered professional engineer will inspect the tank systems prior to placing new tank systems into service (this inspection must be conducted to detect the presence of weld breaks, punctures, scrapes of protective coatings, cracks, corrosion or other structural damages or inadequate construction/installation);

c. documentation that all discrepancies identified by the installation inspection shall be remedied prior to placing the tanks into service;

d. a description of methods which will be utilized to test all new tanks and ancillary equipment for tightness prior to their being placed into use (the permit application must also indicate that if a tank system is found not to be tight, all repairs necessary to remedy the leaks in the system will be performed prior to placing the tanks into use); and

e. a description of methods to be used to support and protect ancillary equipment against physical damage and excessive stress due to vibration, expansion, or contraction.

32. **D-2d(1)(a)** **Tank Age Determination**
[OAC 3745-50-44 (C)(2)(g), 3745-55-93 (A)]

Information must be presented regarding the age of tank V-117.

33. **D-2d(1)(b)** **Requirements for Secondary Containment and Leak Detection**
[OAC 3745-50-44 (C)(2)(g), 3745-55-93 (B) and (C)]

D-2d(1)(c) Requirements for External Liner, Vault, Double- Walled Tank or Equivalent Device
[OAC 3745-50-44 (C)(2)(g), 3745-55-93 (D) and (E)]

The following information must be provided to document compliance with the requirements for secondary containment for tank systems at the facility:

a. Tanks V-114, V-214, V-314, V-414, V-514, V-614 and V-120

The text describing the secondary containment system for the existing waste solvent storage tank farm shall be revised to reference the documentation provided in exhibit D-2. In addition, a detailed as-constructed plan sheet for the secondary containment dike for these tanks shall be included in the application.

b. Tank V-117, Tanks V-6000E and V-6000W

Tank V-117 and tanks V-6000E and V-6000W are located in separate containment areas from other permitted hazardous waste storage tanks at the facility. The permit application must be revised to provide detailed engineering plans and descriptions regarding the design construction, and operation of these secondary containment systems in order to document compliance with the requirements of OAC 3745-55-93 (A) to (F).

c. Proposed Dikes B-4, F-2, East Warehouse Accumulation Tanks, New Corrosive Waste Tanks

1. The description for the secondary containment system for the proposed new hazardous waste tank systems shall be revised to include calculations of the minimum necessary containment volume for each system based upon tank volumes and required allowances for precipitation events.

2. The description of the containment system for the proposed new waste tanks must provide information regarding the impermeable materials which will be used to line or coat the containments systems to prevent migration of wastes into the concrete.

3. The secondary containment system for the proposed new hazardous waste tanks in the east warehouse area is described as the entire floor area. It would appear to be more appropriate for the purposes of spill containment to construct a diked area surrounding the proposed tanks to limit the extent of spread of wastes should the tank systems spill, leak or fail. The permit application shall be revised to describe methods which will be used to control spills from these systems in a manner consistent with the requirements of OAC 3745-54-31.

34. D-2d(1)(d) **Secondary Containment and Leak Detection Requirements for Ancillary Equipment [OAC 3745- 50-44 (C)(2)(g), 3745-55-93 (F)]**

a. Existing Tank Systems

The permit application must be revised to indicate that all ancillary equipment (including all piping, flanges, joints, valves, and other connections) to the tank systems is equipped with secondary containment or are inspected for evidence of leaks daily. For pumps used with existing tank systems, the application must demonstrate that adequate secondary containment has been provided or that the pumps are sealless or magnetic coupling pumps which are visually inspected for evidence of leaks on a daily basis.

b. Proposed New Tank Systems

The permit application must be revised to present documentation regarding how the ancillary equipment associated with the proposed new tank systems at the facility will be designed and operated to comply with the requirements of OAC 3745-55-93 (F).

35. D-2d(2) **Requirements for Tank Systems Until Secondary Containment is implemented [OAC 3745-55-93 (I)]**

The permit application must be revised to indicate that the existing spent acid tank and its ancillary equipment will be tested annually for leaks and/or assessed as required by OAC 3745-55-93 (I)(2) and (3) until secondary containment is provided. Specific test methods to be utilized to meet this requirement must be presented.

36. D-2e **Controls and Practices to Prevent Spills and Overflow [OAC 3745-50-44 (C)(2)(i), 3745-55-94 (A) and (B)]**

a. For existing tanks at the facility, the permit application must be revised to describe methods to be used to prevent spillage of wastes during the disconnection of flexible hoses following the transfer of wastes (see also comments 41 and 46).

b. For proposed new tank systems at the facility, a detailed description of management practices which will be utilized to prevent tank failure, leaks, spills and overflows, meeting the requirements of OAC 3745-55-94 and 95, must be provided.

37. F-1a(2)(b) **Means to Control Entry**
[OAC 3745-54-14 (B)(2)]

The application must be modified to indicate procedures h will be used to prevent unauthorized persons from entering the ity during periods when entrance gates are open.

38. F-2b(1) **Container Inspection**
[OAC 3745-55-74]

The application must be revised to include updated container area inspection forms which will be used in the proposed new hazardous waste container storage areas.

39. F-2b(2) **Tank Inspections**
[OAC 3745-55-95]

The application must be revised to include updated inspection forms which will be used for the proposed new tank systems to be installed.

40. F-2b(2)(a) **Tank System External Corrosion and Releases**
[OAC 3745-55-95 (B)(1)]

The permit application (page F-7) indicates that the above ground piping associated with the hazardous waste tank systems will be inspected on a weekly basis. The application shall be revised to indicate that these inspections shall be conducted on a daily basis.

41. F-2b(2)(c) **Tank System Overfilling Control Equipment**
[OAC 3745-55-95 (A)]

Exhibit F-2 indicates that tank high level alarms will be tested weekly, while page F-6 of the application describes daily tests. Exhibit F-2 shall be revised to indicate that daily tests shall be conducted.

42. F-3a **Equipment Requirements**
[OAC 3745-54-32 and 3745-50-44 (A)(7)]

The "Equipment Requirements" section of Page F-8 must be modified to identify the specific sections in other portions of the permit application which describe how the facility complies with the requirements for internal and external communications equipment, emergency equipment and water supply for fire control. In addition, maps and descriptions found in the permit application must be revised to include information regarding how the facility will comply with the equipment requirements for all of the proposed new hazardous waste management units at the facility.

43. F-3a(3) **Emergency Equipment**
[OAC 3745-54-32 (C)]

The description of emergency fire and spill control equipment must be revised to 1) present a single table listing the type of equipment, its location and an outline of capabilities for all required equipment, and 2) to provide descriptions of proposed additional emergency equipment which will be provided in order to comply with the emergency equipment requirements for the proposed new hazardous waste management units at the facility.

44. F-3a(4) **Water for Fire Control**
[OAC 3745-54-32 (D)]

Documentation must be provided that there will be water available at adequate volumes and pressures to provide fire protection for the proposed new hazardous waste management units at the facility.

45. F-3b **Aisle Space Requirement**
[OAC 3745-54-35]

Page F-8 of the permit application incorrectly references section D-1 of the application as the location of information regarding compliance with aisle space requirements. The correct references shall be provided. In addition, more specific information must be provided regarding the maintenance of aisle space in areas where tote bins are stored.

46. F-4a **Unloading Operations**
[OAC 3745-50-44 (A)(8)(a)]

The following information must be provided or revised in the permit application regarding unloading operations:

a. Figure F-3 must be revised to indicate the specific locations of current and proposed hazardous waste unloading areas.

b. The description of unloading operations for wastes destined for recovery operations references plan sheet 2 as the location of the schematics for the gravity fed piping system and valves in the existing tank farm. The correct reference appears to be Figure F-6.

c. Figure F-6 indicates that there are two valves on each unloading pipe for tanks in the existing tank farm. The application shall be revised to indicate that both valves shall be kept closed when the tanks are not being unloaded.

d. Procedures used by facility personnel to ensure that all couplings, piping and valves are in good working order prior to unloading waste from tanks storing hazardous waste must be described.

e. Piping diagrams and loading/unloading procedures for the proposed new hazardous waste storage tanks at the facility must be included in the permit application.

f. A description of methods used to unload bulk shipments of solvents and corrosive wastes to storage tanks (both from tanker trailers and rail cars) shall be provided. In addition, the procedures used to transfer wastes from containers to tanks shall also be provided. The descriptions shall include the types of pumps used, their locations and methods utilized to prevent malfunctions and/or releases of hazardous wastes during the transfer of wastes.

47. F-4b **Run-off**
[OAC 3745-50-44 (A)(8)(b)]

The permit application must be revised to reference section B-2g in the description of run-off controls. In addition, the proposed system for segregation of rain water from the outfall 001 system must be included in the application. Run-off controls to be used for the proposed new hazardous waste management units at the facility must also be described in the application.

48. F-5b **General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste** [OAC 3745-50-44 (A)(9), 3745-54-17 (B)]

The permit application must be revised to indicate procedures which will be used to segregate potentially incompatible corrosive wastes in the proposed corrosive waste drum storage area. In addition, procedures used to prevent uncontrolled reactions which might threaten the facility or human health and the environment must be provided.

49. F-5d **Management of Incompatible Wastes in Containers**
[OAC 3745-50-44 (C)(1)(d), 3745-55-77]

Section D of the permit application indicates that containers which previously held corrosive wastes which when emptied are determined to be sound will be used for the storage of other wastes managed at the facility. The application must be revised to indicate procedures which will be followed to ensure that wastes are not placed in these containers which could potentially be incompatible with residues remaining from their previous use.

50. F-5e **Management of Ignitable or Reactive Wastes in Tank Systems**
[OAC 3745-50-44 (C)(2)(j), 3745-55-98]

The application must be revised to document procedures which will be used to store ignitable wastes in existing and proposed storage tanks in such a way that it will be prevented from igniting. In addition, documentation must be provided indicating that the proposed new spent solvent storage tanks will be located so that protective distances between the tanks and any public ways, streets, alleys or adjoining property lines will be maintained as required in Tables 2-1 through 2-6 of the NFPA "Flammable and Combustible Liquids Code".

51. F-5f **Management of Incompatible Wastes in Tank Systems**
[OAC 3745-55-99, 3745-50-44 (C)(2)(j)]

The permit application must be revised to provide a description of methods which will be employed to prevent incompatible corrosive wastes from being placed into the proposed corrosive waste tanks at the facility. In addition, methods to be used to prevent waste corrosives from coming into contact with incompatible residues remaining in unwashed tanks which previously held an incompatible waste must be provided.

52. G-2 **Emergency Coordinators**
[OAC 3745-54-52 (D), 3745-54-55]

The contingency plan shall be revised to include a description of the duties of the primary and alternate emergency coordinators for the facility.

53. G-4a **Notification**
[OAC 3745-54-56 (D)]

The Contingency Plan must be modified to indicate that in situations where there has been a release, fire or explosion which could threaten human health or the environment outside of the facility, the following reporting procedures will be followed:

a. in cases where an assessment indicates that evacuation of local areas may be advisable, the emergency coordinator shall immediately notify local authorities and shall be available to offer assistance; and

b. the emergency coordinator shall immediately notify the Ohio EPA emergency response team and provide all information required by OAC 3745-54-56 (D)(2).

54. G-4c **Assessment**
[OAC 3745-54-56 (C) and (D)]

The contingency plan shall be revised to provide specific guidelines to be used by the emergency coordinator to assess emergency situations at the facility. These guidelines shall include criteria for notification of local and state emergency service authorities and the U.S.EPA on-scene coordinator or the National Response Center. In addition, criteria to be considered for determining the need for evacuation of the facility or surrounding areas shall be described.

55. G-4e **Prevention of Reoccurrence or Spread of Fires, Explosions, or Releases** [OAC 3745-54-56 (E)]

The specific procedures which will be employed at the facility to prevent the spread of fires and explosions to other areas of the facility and the methods to be used to control releases of hazardous wastes during an emergency situation shall be full described in the contingency plan. In addition, procedures to be utilized following an emergency situation to ensure that fires, explosion or releases will not reoccur and that all hazardous waste management units are safe for renewed operation shall be described.

56. G-4f **Storage and Treatment of Released Materials**
[OAC 3745-54-56 (G)]

Specific procedures to be utilized to recover and store released materials at the facility must be described in the contingency plan. In addition, a more thorough discussion of the methods to be used to evaluate released materials for disposal following recovery must be provided.

57. G-4g **Incompatible Waste**
[OAC 3745-54-56 (H)(1)]

The contingency plan shall be revised to describe precautions to be taken to prevent the storage of incompatible wastes in areas affected by fires, explosion or releases of hazardous waste until cleanup procedures are completed.

58. G-4h **Post-Emergency Equipment Maintenance**
[OAC 3745-54-56 (H)(2)]

The procedures to be utilized by the facility to ensure that all emergency equipment is replenished and restored to good working order prior to recommencing operations shall be fully described in the contingency plan.

59. G-4i **Container Spills and Leakage**
[OAC 3745-54-52, 3745-55-71]

The contingency plan must be revised to specify safety precautions for responding to container spills and leakage. In addition, internal reporting and tracking procedures used to ensure that spills and leakage from containers have remediated in an expeditions manner shall be described

60. G-4j(1) **Stopping Waste Addition**
[OAC 3745-55-96(A)]

The contingency plan must be revised to indicate that the flow of hazardous waste into tank systems will be stopped immediately should there be a leak or spill or should the tank system be found to be unfit for use. In addition, the plan must provide for a prompt inspection of the tank system to determine the cause of the release.

61. G-4j(2) **Removing Waste**
[OAC 3745-55-96(b)]

The contingency plan must be revised to specify that in the case of releases from tank systems that hazardous wastes will be removed from the system to the extent necessary to prevent further releases and to allow inspection and repair of the tank system. In cases where the release is to a secondary containment system, the contingency plan must specify that all released hazardous waste will be removed within 24 hours.

62. G-4j(3) **Containment of Visible Releases**
[OAC 3745-55-96(C)]

The contingency plan must specify that a visual inspection of the extent of releases from tank systems will be conducted immediately upon discovery. Procedures to be used to prevent the migration of the leak of spill to soils and surface water must also be specified. In addition, the plan must also specify that visible contamination of the soil or surface water will be removed and containerized for proper disposal.

63. G-4j(4) **Notifications, Reports**
[OAC 3745-55-96(D)]

The contingency plan must be revised to indicate that any release from tank systems to the environment greater than one pound or which cannot be immediately cleaned up will be reported to the Director of Ohio EPA within 24 hours.

In addition provisions shall be added that a report describing the likely route of migration of the release; the characteristics of the surrounding soil; the results of any monitoring or sampling conducted in connection with the release; the proximity to downgradient drinking water, surface water, and populated areas; and a description of response actions taken or planned will be submitted to the Director of Ohio EPA within thirty days of any release exceeding the criteria set in OAC 3745-55-96(C)(2).

64. D-4j(5) **Provision of Secondary Containment, Repair or Closure [OAC 3745-55-96(E)]**

The contingency plan must be revised to indicate that following a release from any tank system, the requirement found in OAC 3745-55-96(E)(2) through (4) will be met or that the tank system will be closed according to the requirements of OAC 3745-55-97. The specific procedures for evaluating and repairing tank systems following releases must be described as well as methods for ensuring that repaired system are fit for use prior to their being placed into service.

65. **Certification of Major Repairs [OAC 3745-55-96(F)]**

The contingency plan must be revised to indicate that the facility will comply with the requirements for the certification of any major repairs to tank systems from which there has been a leak or spill or which have otherwise failed by an independent, qualified, registered professional engineer prior to placing the tank back into service. Provision for the submission of the certification to the director of the Ohio EPA within seven days of returning the tank to use must also be included.

66. G-5 **Emergency Equipment [OAC 3745-54-52 (E)]**

See comment for F-3a(3) (comment 42).

67. H-1 **Outline of the Training Program [OAC 3745-54-16 (D)(1) and (2)]**

Section H-1 shall be expanded to provide a brief description of the introductory and continuing training program established to prepare personnel to operate or maintain the facility in a safe manner. This outline shall also contain a brief description of how the training is designed to meet actual job tasks.

68. H-1e **Training for Emergency Response**
[OAC 3745-54-16 (A)(3)]

The permit application must be revised to demonstrate that employees are trained in methods to inspect, repair and replace facility emergency equipment, are trained in key parameters for waste feed cut off systems, the use of communications and alarm systems and in shut down procedures.

69. I-1a **Closure Performance Standard**
[OAC 3745-55-11]

The facility closure plan shall be revised to include a description of how closure will meet the closure performance standard by minimizing the need for further maintenance and eliminating, controlling or minimizing the post-closure release of hazardous waste and hazardous constituents.

In addition to the comments listed below, the facility closure plan must be modified to meet the content requirements found in OAC 3745-55-12 which are fully described in the latest edition of the Ohio EPA "Closure Plan Review Guidance".

70. I-1c **Maximum Waste Inventory**
[OAC 3745-55-12 (B)(3)]

The maximum inventory of hazardous wastes and hazardous constituents for each hazardous waste management unit at the facility must be provided. This inventory shall provided a complete list of hazardous waste and hazardous constituents (by EPA hazardous waste number and generic chemical name) specific to each unit, as well as an estimate of the maximum amount of each hazardous waste ever treated, stored or disposed in each unit. Reference to the facility's Part A application is not sufficient to meet this requirement.

71. I-1d **Schedule for Closure**
[OAC 3745-55-12 (B)(6)]

The schedule for closure of the facility shall be revised in accordance with revisions made to the facility closure plan as the result of the comments provided herein. In addition, the facility closure plan shall be revised to clearly indicate critical dates for closure activities which will require the attendance of the certifying professional engineer or his/her designated representative. A provision shall be made to notify the Ohio EPA inspector designated for the facility five (5) working days prior to conducting the identified critical closure activities.

72. I-1e(1) **Inventory Removal**
[OAC 3745-55-12 (B)(3)]

The permit must include a discussion of the methods which will be used to remove, transport, treat, store or dispose of all hazardous wastes at the facility at the time of closure and identify the types of off-site hazardous waste management units to be used for treatment or disposal of hazardous wastes from the facility.

73. I-1e(2) **Disposal or Decontamination of Equipment, Structures, and Soils** [OAC 3745-55-12 (B)(4), 3745-55-14]

The closure plan must be revised to provide a detailed description of the steps needed to decontaminate or dispose of all equipment or structures associated with the hazardous waste management units at the facility. This description shall include the following information:

a. a complete description of all hazardous waste management units at the facility to be closed as identified in the Part A application, including: a list of associated equipment; detailed drawings of the units to be closed and all ancillary equipment; a description of the period of use, identification of the hazardous wastes managed in the unit (by EPA identification number and chemical name); pertinent physical data and construction details; and a description of underlying soils and site geology.

b. decontamination procedures for structures and equipment;

c. criteria for determining whether structures, equipment or underlying soils are contaminated;

d. management practices for wastes generated during closure;

e. methods and criteria for the verification of the effectiveness of closure activities; and

f. quality assurance/quality control procedures for the implementation of closure including sample collection and analysis.

74. I-1e(3) **Closure of Disposal Units/Contingent Closures**
[OAC 3745-55-78, 3745-55-97, 3745-55-12 (C), 3745-50-44 (A)(13)]

The closure plan shall be revised to describe how the facility shall implement closure and post-closure care should information gathered during closure activities indicate that it will be necessary to close any of the hazardous waste management units as a landfill. In addition, the closure plan should also provide for the contingency of the use of health-based risk assessments for the demonstration of clean closure.

75. I-1e(4) **Closure of Containers**
[OAC 3745-55-78, 3745-55-12 (B)(3)]

The closure plan shall be revised to include a complete description of the methods to be utilized to close the hazardous waste container storage areas at the facility. This description shall address the following: hazardous waste removal and disposal; container decontamination and disposal; decontamination methods for contaminated equipment, structures and soils, as well as management protocols for wastes generated during closure; methods to be used to verify the adequacy of decontamination and/or removal efforts (i.e. clean standards for decontaminated equipment, structures and impacted soils and/or ground water); and methods to be used for disposal of wastes and residues generated during closure. In revising the closure plan, the facility should consult the Ohio EPA "Closure Plan Review Guidance".

76. I-1e(5) **Closure of Tanks**
[OAC 3745-55-97, 3745-55-12 (B)(3)]

The closure plan shall be revised to include a complete description of the methods to be utilized to close the hazardous waste storage tanks. This description shall address the following: hazardous waste removal and disposal; tank decontamination and disposal; decontamination methods for contaminated ancillary equipment, and associated structures and soils, as well as management protocols for wastes generated during closure; methods to be used to verify the adequacy of decontamination and/or removal efforts (i.e. clean standards for decontaminated equipment, structures and impacted soils and/or ground water); and methods to be used for disposal of wastes and residues generated during closure. In revising the closure plan, the facility should consult the Ohio EPA "Closure Plan Review Guidance".

77. I-3a **Certification of Closure**
[OAC 3745-55-15]

Section I-1G of the closure plan shall be revised to indicate that the certification of closure to the Director of Ohio EPA shall be accompanied by all supporting documentation verifying that closure has been completed according to the approved closure plan.

78. I-4 **Closure Cost Estimate**
[OAC 3745-50-44 (A)(15), 3745-55-42]

The closure cost estimate for the facility must be revised to include a detailed listing of all cost which will be incurred during closure including costs for the services of the independent professional engineer, personnel costs, and the cost for sampling and analysis necessary for the verification of the adequacy of closure procedures.

79. NOTICE

The financial assurance documentation provided in the Part B permit application is not the most recent for the facility. Currently it is outdated by two years. Therefore, the Part B application is technically inadequate with respect to financial assurance. In order for the application to be considered adequate, Hukill Chemical Corp. must provide the following information:

1) A copy of the most recent (1990) closure estimate;

2) A copy of the August 1, 1989 Letter of Credit and August 4,1989 Trust Agreement, and any 1990 updates to these documents;

3) A copy of the current (1990) Hazardous Waste Facility Certificate of Liability Insurance.

END OF COMMENTS

HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD • BEDFORD, OHIO 44146-4493 • 216 / 232-9400 • FAX 216 / 232-9477

Over Forty Years of Quality Products and Services

July 3, 1990

Dr. Richard Shank, Director
Ohio EPA
P.O. Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266-0149
Attention: Mr. Tom Crepeau

Re: Request for a Permit Revision
US EPA ID No. OHD001926740
Ohio Permit No. 02-18-0315

Dear Dr. Shank:

Hukill Chemical Corporation (HCC) is requesting a revision to their Interim Status RCRA Permit due to a Rule Change, Toxic Characteristics (TC).

HCC recycles spent solvents through distillation processes. The distillation bottoms and other non-recyclable solids are shipped to permitted facilities for use as supplemental fuel, and thus, thermally destructed. Some wastes may, infrequently, be sent to permitted facilities for Commercial Incineration.

The new TC regulations make D wastes of many of the wastes HCC accepts as F and U wastes under their permit. HCC also does not want to reject recyclable materials from potential customers which may contain trace amounts of D wastes that are above the regulatory levels. Although HCC does not wish to handle some of the TC chemicals, they must have permitting for them so that if the chemicals are present in D001 or F wastes in trace amounts, the solvents can still be recovered.

HCC would like to add the following wastes to their permit:

D010 ... Selenium	D011 ... Silver
D012 ... Endrin	D013 ... Lindane
D014 ... Methoxychlor	D015 ... Toxaphene
D016 ... 2,4-D	D017 ... 2,4,5-TP (Silvex)
D018 ... Benzene	D019 ... Carbon Tetrachloride
D020 ... Chlordane	D021 ... Chlorobenzene
D022 ... Chloroform	D023 ... o-Cresol
D024 ... m-Cresol	D025 ... p-Cresol
D026 ... p-Cresol	D027 ... 1,4-Dichlorobenzene
D028 ... 1,2-Dichloroethane	D029 ... 1,1-Dichloroethylene
D030 ... 2,4-Dinitrotoluene	D031 ... Heptachlor
D032 ... Hexachlorobenzene	D033 ... Hexachloro-1,3-butadiene
D034 ... Hexachloroethane	D035 ... Methyl Ethyl Ketone
D036 ... Nitrobenzene	D037 ... Pentachlorophenol

D038 ... Pyridine
D039 ... Tetrachloroethylene
D040 ... Trichloroethylene
D041 ... 2,4,5-Trichlorophenol
D042 ... 2,4,6-Trichlorophenol
D043 ... Vinyl Chloride

HCC has submitted a previous revision request, dated March 31, 1989, and Revised Part A, dated December 14, 1989, for the remaining six toxic metals which are now listed under the TC Rule. Their D codes are D004, D005, D006, D007, D008 and D009.

Please contact me at Hukill Chemical, (216) 232-9400 if you have any questions or require more information regarding the above.

Sincerely yours,

Edgar M. Price (pk)

Edgar M. Price
Engineering Consultant

EMP:pk

cc: Robert L. Hukill, President
Paul Anderson, Ohio EPA, Twinsburg
Lisa Pierard, USEPA, Region V - Chicago
Nick Andrianas, Eder Associates

OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

CERTIFIED MAIL

RE: Hukill Chemical Corp.
OHD 001 926 740
OHIO 02-18-0315

August 31, 1989

Mr. Robert L. Hukill
Hukill Chemical Corp.
7013 Krick Road
Bedford, Ohio 44146

Dear Mr.Hukill:

Thank you for submitting Part B of the Resource Conservation and Recovery Act (RCRA) permit application for your facility.

As you may know, Ohio has recently been delegated authorization to operate its hazardous waste management program in lieu of the Federal hazardous waste program. Ohio now has the responsibility for issuing Resource Conservation and Recovery Act (RCRA) permits for hazardous waste treatment, storage and disposal facilities subject to the authority retained by U.S. EPA under the Hazardous and Solid Waste Amendment of 1984 (HSWA) to RCRA. Since the requirements and prohibitions imposed by HSWA are effective immediately regardless of a State's authorization status, USEPA will continue to implement the applicable HSWA requirements. In other words under HSWA, there will continue to be a dual State/Federal regulatory program in Ohio. To the extent Ohio's authorized program is unaffected by HSWA, the Ohio program will operate in lieu of the Federal program. To the extent HSWA-related requirements are in effect, USEPA will continue to administer and enforce those portions of HSWA in Ohio (which may include the issuance of full or partial permits) until Ohio receives authorization to do so and until that time, Ohio will continue to assist USEPA's implementation of the HSWA requirements under a cooperative agreement.

The Ohio EPA Division of Solid and Hazardous Waste Management has conducted a "completeness" review of your Part B application and has determined it to be complete. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapter in the Ohio Administrative Code and the corresponding Federal regulations. Completeness means that all items required by regulation appear to have been addressed in your application, but does not mean that these items have been addressed substantively or in adequate detail which would allow a determination to be made as to whether the proposal complies with the Director's Hazardous Waste Facility Standards Chapters.

We will now begin our "technical adequacy" review during which we analyze the application for compliance with applicable hazardous waste management requirements of State and Federal law. We will be working in concert with the U.S. EPA throughout the course of the technical adequacy review. Please understand that either, or both, of our Agencies may request additional information from you if it is necessary to clarify, modify, or supplement previous submissions in order to substantively evaluate the permit application for technical adequacy.

If you have any questions concerning the review, or the level of detail we expect, please do not hesitate to contact Robert F. Babik, at (614) 644-2949.

Finally, as you may know Ohio's hazardous waste law was recently amended to authorize the Attorney General to conduct background investigations on permittees and applicants for permits for hazardous waste treatment, storage and disposal facilities. Every applicant must file a disclosure statement with both the Ohio EPA and the Attorney General, on a form developed by the Attorney General at the same time that the applicant files his hazardous waste permit application with the Ohio EPA (ORC 3734.42(A)). The disclosure statement and the investigative report provided by the Attorney General will form a basis along with the complete and technically adequate permit application for the State's determination on the permit renewal. If there are questions concerning the disclosure statement please contact Brian Zina, of the OAG at (614)466-2766.

Yours truly,

Edward A. Kitchen

E.A. Kitchen, Manager
Technical Assistance and Engineering Section
Division of Solid and Hazardous Waste Management

EAK/pas

cc: Lisa Pierard, USEPA
Joel Morbito, USEPA
Paul Anderson, NEDO, DSHWM, OEPA
Robert F. Babik, CO, DSHWM, OEPA
Ed Lim, CO, DSHWM, OEPA

1938U

HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD • BEDFORD, OHIO 44146-4493 • 216 / 232-9400

Over Forty Years of Quality Products and Services

June 5, 1989

Ms. Lisa Pierard
RCRA Activities
Part B Application
U.S. EPA - Region V
Chicago, Illinois 60690-3587

Re: Hukill Chemical Corporation
Part B Application
OHD 001 926 740
Ohio 02-18-0315

Dear Ms. Pierard,

Enclosed is the "Certification of Closure" addition for completing our Part B as requested in Mr. Edward Kitchen's May 12, 1989 memo to Robert Hukill. This page contains the required additional part for Section I. It should replace the current page which is also Revision 2, but dated 2/24/89.

If you have any questions or comments regarding the attached, please call Ed Price at Hukill Chemical, (216) 232-9400.

Very truly yours,

Edgar M. Price
Engineering Consultant

EMP/pk
Enclosure

cc: Tom Crepeau/Robert F. Babik
Paul Anderson
Robert Hukill

The procedures for decontaminating equipment is described in Section I-1-d. Any tank trucks owned by Hukill would be decontaminated by the same process as described for tanks.

I-1g CERTIFICATION OF CLOSURE

HUKILL CHEMICAL WILL SEND A CERTIFICATION OF FINAL CLOSURE TO THE DIRECTOR OF THE OHIO EPA AND TO THE REGIONAL ADMINISTRATOR OF THE U.S. EPA BY REGISTERED MAIL WITHIN 60 DAYS AFTER THE COMPLETION OF FINAL CLOSURE. THE CERTIFICATION WILL STATE THAT THE CLOSURE HAS BEEN COMPLETED ACCORDING TO THE SPECIFICATIONS OF AN APPROVED CLOSURE PLAN. THE CERTIFICATION WILL BE SIGNED BY THE PRESIDENT OF HUKILL CHEMICAL AND BY A REGISTERED PROFESSIONAL ENGINEER.

OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Francine

Toward A Cleaner Environment
15 Year Anniversary
1972 - 1987

Richard F. Celeste
Governor

RE:Hukill Chemical Corp.
Re # OHD 001 926 740
OHIO 02-18-0315

CERTIFIED MAIL

May 12, 1989

Mr. Robert L. Hukill
Hukill Chemical Corp.
7013 Krick Road
Bedford, Ohio 44146

Dear Mr. Hukill:

Thank you for submitting the revisions on February 24, 1989 to the Part B of the Resource Conservation and Recovery Act (RCRA) permit application for your facility pursuant to both the State and Federal Part B call-in. Hukill Chemical Corporation adequately addressed the deficiencies noted in the January 24, 1989 notice of deficiency. However, based on additional review of the Part B application an additional missing item was noted as indicated on Attachment A.

As you may know, Ohio, which has a State hazardous waste program, has not yet been delegated full authority to conduct the federal hazardous waste program. As a result, hazardous waste facilities operating in Ohio must obtain both a State and Federal RCRA permit. However, pursuant to an agreement reached with U.S. EPA, Ohio EPA is conducting initial "completeness" reviews and making "completeness" determinations on behalf of the U.S. EPA for facilities that store or treat hazardous waste in containers and tanks. In other words, until such time as the State is authorized to conduct the federal hazardous waste program, Ohio EPA will examine RCRA permit applications to ascertain whether or not the application contains all required information in order to be deemed "complete" and thereafter Ohio EPA and U.S. EPA will concurrently review the permit application for technical adequacy.

The Ohio EPA Division of Solid and Hazardous Waste Management has conducted a "completeness" review of your Part B application and has determined it to be incomplete. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapter in the Ohio Administrative Code and the corresponding Federal regulations.

We have enclosed comments that are the result of this review. Please provide detailed information addressing all areas indicated on the comment sheets to

053-50

Ohio EPA within 30 days of the date of receipt of this correspondence. This submission shall be in accordance with the following editorial protocol or convention:

1. Old language is over-struck.

2. New language is capitalized

3. Page headers should indicate date of submission.

4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

Please send one copy each to:

Tom Crepeau/Robert F. Babik
Ohio EPA, DSHWM
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-0149

Paul Anderson,
Ohio EPA, DSHWM, NEDO
2110 East Aurora Road
Twinsburg, Ohio 44087

Lisa Pierard,
RCRA Activities
Part B Application
U.S. EPA - Region V
Chicago, Illinois 60690-3587

Upon receipt of a satisfactory response regarding all the information requested, Ohio EPA will notify you in writing that the application is

complete. Our determination of completeness will mean that all items required by regulation appear to have been addressed in your application, but does not mean that these items have been addressed substantively or in adequate detail which would allow a determination to be made as to whether the proposal complies with the Director's Hazardous Waste Facility Standards Chapters. We may request additional information from you, if it is necessary to clarify, modify or supplement previous submissions of information in order to substantively evaluate the permit application for technical adequacy.

Failure to submit a complete permit application or to correct deficiencies in the application may result in the following: 1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, 2) denial of the application for a renewal permit, 3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action, or 4) the application for a renewal permit may be returned to you as incomplete.

If you have any questions concerning the review of the permit application, or the level of detail we expect, please do not hesitate to contact Robert F. Babik, at (614) 644-2949.

Finally, as you may know, Ohio's hazardous waste law was recently amended to authorize the Attorney General to conduct background investigations on permittees and applicants for permits for hazardous waste treatment, storage and disposal facilities. Every applicant must file a disclosure statement with both the Ohio EPA and the Attorney General on a form developed by the Attorney General, at the same time that the applicant files his hazardous waste permit application with the Ohio EPA (ORC 3734.42(A)). The disclosure statement and the investigative report provided by the Attorney General will, form a basis along with the complete and technically adequate permit application for the State's determination on the permit renewal. If there are questions concerning the disclosure statement please contact Bryan Zima, of the OAG at (614) 466-2766.

Yours truly,

Edward A. Kitchen

E.A. Kitchen, Manager
Technical Assistance and Engineering Section
Division of Solid and Hazardous Waste Management

EAK/RFB/pas

cc: Lisa Pierard, USEPA
Joel Morbito, USEPA
Ed Lim, CO, DSHWM, OEPA
Robert F. Babik, CO, DSHWM, OEPA
Paul Anderson, NEDO, Ohio EPA

1814U

ATTACHMENT A
THE DIVISION OF SOLID AND HAZARDOUS WASTE MANAGEMENT.
COMMENTS ON HUKILL CHEMICAL CORPORATION
PART B APPLICATION

I. Closure Plan
40CFR 264.115; OAC 3745-50-44(A)(13); OAC 3745-55-15

Failure to provide a statement that within 60 days of the completion of final closure, closure certification will be submitted to the Director of the Ohio EPA and the Regional Administrator of U.S. EPA.

HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD • BEDFORD, OHIO 44146-4493 • 216 / 232-9400

Over Forty Years of Quality Products and Services

February 24, 1989

Ms. Lisa Pierard
RCRA Activities
Part B Application
U.S. EPA - Region V
Chicago, Illinois 60690-3587

Dear Lisa,

The enclosed is Hukill Chemical Corporation's response to the "Initial Completeness Review Deficiency Comments" included in Mr. E. A. Kitchen's January 24, 1989 memo to Mr. Robert Hukill. The reference on Mr. Kitchen's memo was #OHD 001 926 740, OHIO 02-18-0315. This is Hukill Chemical Corporation's application for Part B.

In addition to responding to the completeness comments, we have tried to revise portions that were not current and clean up some of the typos.

If you have any questions regarding the attached, please call Ed Price or me at Hukill Chemical, (216) 232-9400.

Very truly yours,

HUKILL CHEMICAL CORPORATION

Robert L. Hukill
President

RLH:pk
Enclosures

cc: Paul Anderson
Tom Crepeau/Susan Nitecki

053-47

Francine

CERTIFIED MAIL

RE: Hukill Chemical Corp.
Re # OHD 001 926 740
OHIO 02-18-0315
January 24, 1989

Mr. Robert L. Hukill
Hukill Chemical Corp.
7013 Krick Road
Bedford, Ohio 44146-4493

Dear Mr. Hukill:

Thank you for submitting Part B of the Resource Conservation and Recovery Act (RCRA) permit application for your facility pursuant to both the State and Federal Part B call-in.

As you may know, Ohio, which has a State hazardous waste program, has not yet been delegated full authority to conduct the federal hazardous waste program. As a result, hazardous waste facilities operating in Ohio must obtain both a State and Federal RCRA permit. However, pursuant to an agreement reached with U.S. EPA, Ohio EPA is conducting initial "completeness" reviews and making "completeness" determinations on behalf of the U.S. EPA for facilities that store or treat hazardous waste in containers and tanks. In other words, until such time as the State is authorized to conduct the federal hazardous waste program, Ohio EPA will examine RCRA permit applications to ascertain whether or not the application contains all required information in order to be deemed "complete" and thereafter Ohio EPA and U.S. EPA will concurrently review the permit application for technical adequacy.

The Ohio EPA Division of Solid and Hazardous Waste Management has conducted a "completeness" review of your Part B application and has determined it to be incomplete. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapter in the Ohio Administrative Code and the corresponding Federal regulations.

We have enclosed comments that are the result of this review. Please provide detailed information addressing all areas indicated on the comment sheets to

053-45

Ohio EPA within 30 days of the date of receipt of this correspondence. This submission shall be in accordance with the following editorial protocol or convention:

1. Old language is over-struck.

2. New language is capitalized

3. Page headers should indicate date of submission.

4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

Please send one copy each to:

Tom Crepeau/Susan Nitecki,
Ohio EPA, DSHWM
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-0149

Paul Anderson,
Ohio EPA, DSHWM, NEDO
2110 East Aurora Rd.
Twinsburg, Ohio 44087

Lisa Pierard,
RCRA Activities
Part B Application
U.S. EPA - Region V
Chicago, Illinois 60690-3587

Upon receipt of a satisfactory response regarding all the information requested, Ohio EPA will notify you in writing that the application is

complete. Our determination of completeness will mean that all items required by regulation appear to have been addressed in your application, but does not mean that these items have been addressed substantively or in adequate detail which would allow a determination to be made as to whether the proposal complies with the Director's Hazardous Waste Facility Standards Chapters. We may request additional information from you, if it is necessary to clarify, modify or supplement previous submissions of information in order to substantively evaluate the permit application for technical adequacy.

Failure to submit a complete permit application or to correct deficiencies in the application may result in the following: 1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, 2) denial of the application for a renewal permit, 3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action, or 4) the application for a renewal permit may be returned to you as incomplete.

If you have any questions concerning the review of the permit application, or the level of detail we expect, please do not hesitate to contact Susan Nitecki, at (614) 644-2956.

Finally, as you may know, Ohio's hazardous waste law was recently amended to authorize the Attorney General to conduct background investigations on permittees and applicants for permits for hazardous waste treatment, storage and disposal facilities. Every applicant must file a disclosure statement with both the Ohio EPA and the Attorney General on a form developed by the Attorney General, at the same time that the applicant files his hazardous waste permit application with the Ohio EPA (ORC 3734.42(A)). The disclosure statement and the investigative report provided by the Attorney General will, form a basis along with the complete and technically adequate permit application for the State's determination on the permit renewal. If there are questions concerning the disclosure statement please contact Bryan Zima, of the OAG at (614) 466-2766.

Yours truly,

Edward A. Kitchen

E.A. Kitchen, Manager
Technical Assistance and Engineering Section
Division of Solid and Hazardous Waste Management

cc: Lisa Pierard, USEPA
Paul Anderson, NEDO
Susan Nitecki, CO
Ed Lim, CO

1698U

Hukill Chemical Corporation
Initial Completeness Review
Deficiency Comments

1. OAC 3745-50-43(A)(5), 40 CFR 270.13(h)(2) Failure to provide photographs of the facility clearly delineating all existing structures; existing treatment, storage, and disposal areas; and sites of future treatment, storage, and disposal areas.

2. OAC 3745-55-75(C), 40 CFR 264.175(c) Failure to provide, by use of an acceptable analytical method, for demonstration that free liquids are not present in containers stored on the East Pad area.

3. OAC 3745-54-13(A)(1), 40 CFR 264.13(a)(1)
ORC 3734.05(G)(1), 40 CFR 264.191(b)(2) Failure to provide hazardous characteristics of the wastes that have been and will be handled in tanks.

4. ORC 3734.05(G)(1), 40 CFR 264.193 Failure to demonstrate compliance with 40 CFR 264.193 regarding containment and detection of releases for tank systems and components, or to demonstrate that 40 CFR 264.193 is not applicable under 264.193(a).

5. OAC 3745-54-51(A), 40 CFR 270.14(b)(7) Failure to include, in the contingency plan, the facility name and location, operator, site plan, and description of facility operations.

6. ORC 3745-54-51(A), 40 CFR 264.197(c) Failure to demonstrate compliance with 40 CFR 264.197(c) regarding closure requirements for tank systems that do not have secondary containment.

7. OAC 3745-55-51, 40 CFR 264.151(j) Failure to provide Exhibit 5 of Appendix B as referenced in Section I, p. 5 of the application in regard to demonstration of liability insurance.

HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD · BEDFORD, OHIO 44146-4493 · 216 / 232-9400

Over Forty Years of Quality Products and Services

January 13, 1989

Ms. Francine Norling
U S EPA
Waste Management Branch
230 S. Dearborn Avenue
Chicago, Illinois 60604

Re: Part B
US EPA I.D. No. OHD001926740
Ohio Permit No. 02-18-0315

Dear Francine:

Enclosed is an addition to Section A of Part A, of our Part B Application. This is being submitted to Ohio EPA on this date.

Should you have any questions, please phone me at (216) 232-9400.

Very truly yours,

HUKILL CHEMICAL CORPORATION

Robert L. Hukill
President

RLH:dk

Enclosures

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<antinued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)

W	0	H	D	0	0	1	9	2	6	7	4	0		1

FOR OFFICIAL USE ONLY

W	DUP		2	DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D004	60,000	G	S01 S02 T04	Included on page 5, D001
2	D005	included in above	G	S01 S02 T04	and seperate solids
3	D006	" "	G	S01 S02 T04	Revised 01/13/89
4	D007	" "	G	S01 S02 T04	"
5	D008	" "	G	S01 S02 T04	"
6	D011	" "	G	S01 S02 T04	"
7				S01 S02	
8					
9					
10					
12					
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17					
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21					
22					
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25					
26					

CONTINUE ON R

HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD · BEDFORD, OHIO 44146-4493 · 216 / 232-9400

Over Forty Years of Quality Products and Services

January 18, 1988

Ms. Francine Norling
U.S. EPA
Waste Management Branch
230 S. Dearborn Avenue
Chicago, Illinois 60604

Dear Ms. Norling:

Enclosed is a copy of Hukill Chemical Corporation's Listing of Safety and Emergency Equipment and a map of where the equipment is found. Please revise your copies of Hukill Chemical's Part B application.

If you have any questions regarding the enclosed, please don't hesitate to call.

Very truly yours,

HUKILL CHEMICAL CORPORATION

Robert L. Hukill
President

RLH:kk

Enclosures

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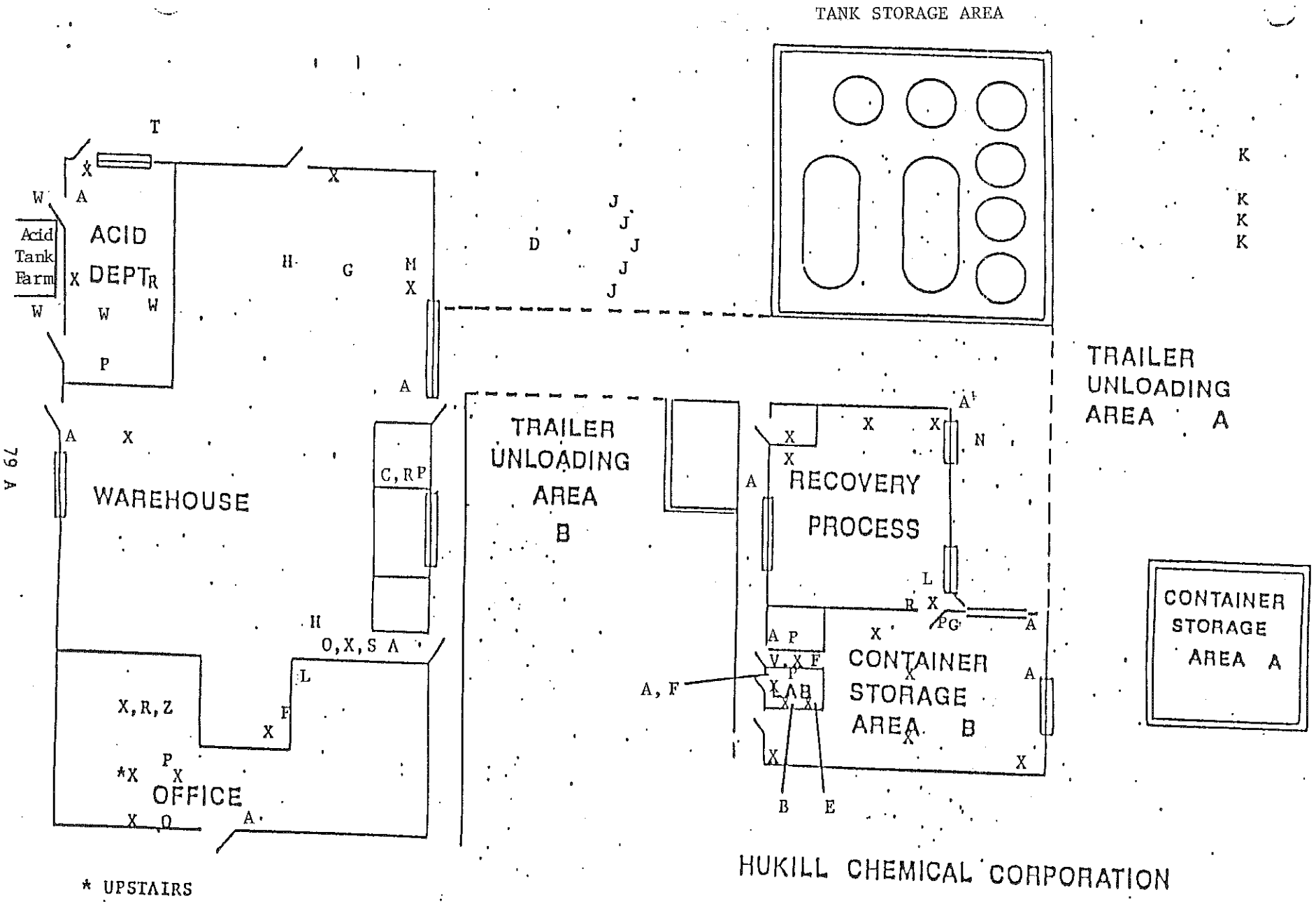


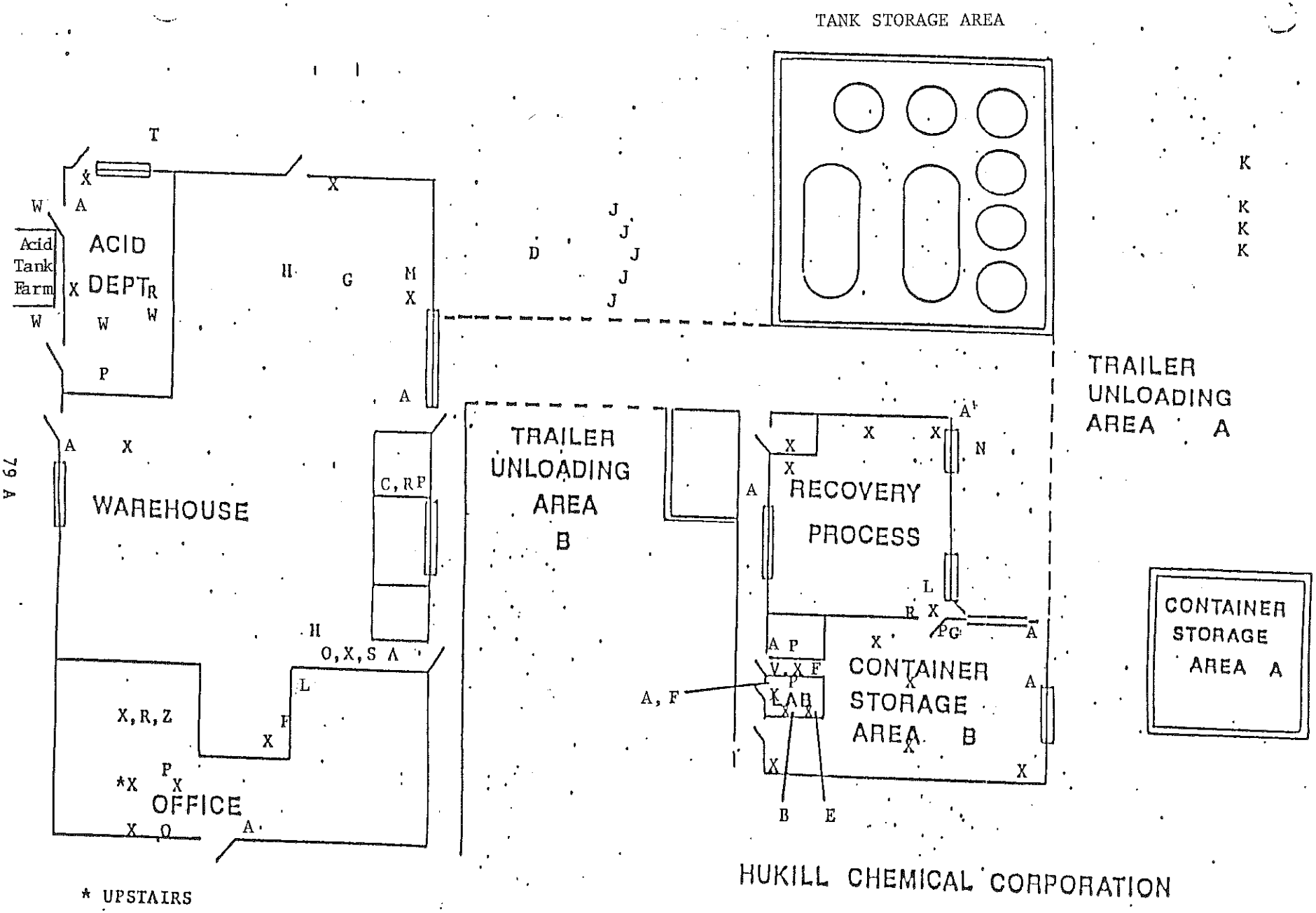
LOCATION OF SAFETY AND EMERGENCY EQUIPMENT

FIG. G 2

SAFETY AND EMERGENCY EQUIPMENT

A. Fire alarm pulls
B. Fire blanket
C. Self contained breathing equipment
D. Fire hydrant
E. Main electrical switch
F. First aid station
G. Emergency supply cabinets
H. Hose connected to sprinkler system
J. Fire wall
K. A.P.I. separator and spill basin
L. Emergency lighting
M. Fire skid with foam for tank fires
N. Skids with spill treatment absorbent and assessories
O. Oxygen (dial 201)
P. Telephone and intercom
R. Organic vapor respirator
S. Stretcher
T. 250,000 gal. H_2O tank, heated, for sprinklers
V. Vent switch
W. Emergency eye wash
X. Portable fire extinguishers
Z. Cutting torch

KEY FOR FIGURE G 2



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KEY FOR FIGURE G 2

HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD • BEDFORD, OHIO 44146-4493 • 216 / 232-9400

Over Forty Years of Quality Products and Services

December 11, 1987

Ms. Francine Norling
U.S. EPA
Waste Management Branch
230 S. Dearborn Avenue
Chicago, Illinois 60604

Dear Ms. Norling:

Enclosed is a copy of Hukill Chemical Corporations Emergency Cordinators and Closure Cost Estimate sheets. Please revise your copies of Hukill Chemicals Part B application.

If you have any questions regarding the enclosed, please don't hesitate to call.

Very truly yours,

HUKILL CHEMICAL CORPORATION

Robert L. Hukill
President

RLH:kk

Enclosures

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I-4 Closure Cost Estimate

Schedule A Continued

CURRENT COST ESTIMATE FOR FACILITY CLOSURE
HUKILL CHEMICAL CORPORATION
December, 1987

TANKS

Number	Capacity in Gallons	Total Gallons
7	14,000	98,000
1	17,000	17,000
2	6,000	12,000
		127,000
1 (spent acid)	12,000	12,000
		139,000

Disposal Cost

Solids	3,000 gallons	- clean out tanks	$ 6,000
		- fuels mix, 55 drum @50 each	2,750
Liquid	124,000 gallons	@ .35 each	43,400
	127,000 gallons		
Spent Acid	12,000 gallons	@ 1.80/gal.	21,600

CONTAINERS

Number	Capacity in Gallons	Total Gallons
1,000	55	55,000

Disposal Cost

Solids	1,375 gallons	- fuels mix, 25 drum @50. each	$ 1,250
Liquid	53,625 gallons	@ .35 each	18,769
	55,000		93,769

DECONTAMINATION

Contaminated Soil	5,000
Clean Up Containment areas	3,000
Decontamination of Equipment	2,000

CONTINGENCY 10,000

Closure Cost 113,769

G-2 EMERGENCY COORDINATORS

1. Robert Hukill - President Primary Coordinator

[redacted]

Work Phone: 216-232-9400

Home Phone: [redacted]

2. Robert Lang - Production Supervisor

[redacted]

Work Phone: 216-232-9400

Home Phone: [redacted]

3. Steve Schillinger - Maintenance Supervisor

[redacted]

Work Phone: 216-232-9400

Home Phone: [redacted]

The above listed emergency coordinators are hereby authorized to commit necessary resources to repond to rectify any emergency situation requiring the implementation of this contingency plan.

Robert L. Hukill - President

Signature Robert L Hukill Date 12/19/87

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 15 APR 1987

SUBJECT: Contractor Assistance for Part B Permit Application Review
Hukill Chemical Company - OHD 001926740

FROM: James R. Hayka, Acting Chief
Technical Programs Section

TO: Judy Kertcher, Chief
Program Management Section

I am requesting contractor assistance for review of the revised Part B application submitted by Hukill Chemical Company on March 23, 1987. We need a completeness and technical adequacy review of the Part B application. If the application is deficient, we request the contractor to prepare a Notice of Deficiency. We need this work completed by May 29, 1987.

cc: Lisa Pierard
Pat Wagtman

5HS/Norling:vw 3/30/87 Disk 2

053-34

HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD · BEDFORD, OHIO 44146 · 216/232-9400

Over Thirty-Five Years of Quality Products and Services

March 25, 1986

Ms. Rebecca Strom
US EPA RCRA Section
213 Dearborn Ave.
Chicago, Illinois

Dear Ms. Strom:

Attached are the latest updates to our Part B. These sections are Part A, additional tanks, the addition of the Spent Acid operation and the storage tank, also the update of Cadence Product 312 (Hazardous Waste derived Chemical Feed Stock that is burned in the iron making blast furnace).

If you have any questions about these sections please give me a call.

Very truly yours,

HUKILL CHEMICAL CORPORATION

Robert L. Hukill
President

RLH/cb

Enclosures

cc: Chris Bauer OEPA, Eng. Section, Columbus
Kris Coder OEPA, NEDO Twinsburg

C53-24

5HS-13

MAY 24 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Robert Hukill
Hukill Chemical Company
7013 Krick Road
Bedford, Ohio 44146

Re: Corrective Action Requirements,
Hazardous and Solid Waste
Amendments of 1984
Hukill Chemical Company
OHD 001 926-740

Dear Mr. Hukill:

As you know, we are currently reviewing Part B of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to modify RCRA. Under Section 206 (copy enclosed) of the Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken, or will be taken, pursuant to a RCRA permit. An important part of our determination includes your willingness (or unwillingness) to sign the enclosed certification statement. Please read it carefully, and either sign it and return it, or return it to us unsigned with a cover letter of explanation, within three weeks of the date of this letter. Any information regarding releases of hazardous waste or hazardous constituents to the environment will be evaluated during the permit review process. Any tentative decision we make concerning your permit application will be public noticed in a newspaper of general circulation in the area of the facility.

Please contact the previously identified permit writer with our Agency for additional information.

Sincerely yours,

David Stringham

David A. Stringham, Acting Chief
Solid Waste Branch

Enclosures

CWS-2485

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	J. Turner	BLS		DJB				
DATE	5/23/85	5/23/85		5/23/85		5/24		